

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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Chapter 11

Case No. 22-60043 (CML)

**SUMMARY COVER SHEET TO THE
FIRST AND FINAL FEE APPLICATION OF JACKSON WALKER LLP AS COUNSEL
TO THE SUBCHAPTER V TRUSTEE FOR THE PERIOD SEPTEMBER 11, 2022
THROUGH MAY 31, 2024**

| | | |
|---|-------------------------------------|-----------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | 11/7/2022 [Docket No. 265] | |
| | Beginning Date | End Date |
| Time period covered by this Application | 9/11/2022 | 5/31/2024 |
| Time period(s) covered by prior Applications: | N/A | N/A |
| Total fees requested in this Application: | \$326,248.30 | |
| Total professional fees requested in this Application | \$300,182.70 | |
| Total actual professional hours covered by this Application: | 540.5 | |
| Average hourly rate for professionals: | \$555.38 | |
| Total paraprofessional fees requested in this Application: | \$26,065.60 | |
| Total actual paraprofessional hours covered by this Application: | 103.6 | |
| Average hourly rate for paraprofessionals: | \$251.60 | |
| Reimbursable expenses sought in this application: | \$14,276.25 | |
| Total to be Paid to Priority Unsecured Creditors: | N/A | |
| Anticipated % Dividend to Priority Unsecured Creditors: | N/A | |
| Total to be Paid to General Unsecured Creditors: | N/A | |
| Anticipated % Dividend to General Unsecured Creditors: | N/A | |
| Date of Confirmation Hearing: | N/A | |
| Indicate whether plan has been confirmed: | No. | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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) Chapter 11
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**FIRST AND FINAL FEE APPLICATION OF
JACKSON WALKER LLP AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM SEPTEMBER 11, 2022 THROUGH MAY 31, 2024**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”) Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *First and Final Fee Application of Jackson Walker LLP counsel for the Subchapter V Trustee for Allowance and Payment of Fees and Expenses for the Period From September 11, 2022 Through May 31, 2024* (the “Application”).

Relief Requested

1. JW requests that the Court enter an order allowing JW’s compensation for professional services rendered during September 11, 2023 through May 31, 2024 (the “Application”).

Period”) for (a) \$326,248.30 for professional fees and services provided during the Application period, and (b) \$14,276.25 for reimbursement of actual and necessary expenses incurred by JW. JW did not receive a retainer nor does it hold any monies in trust.

Jurisdiction

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The basis for the relief requested herein is § 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), LR 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”).

Procedural Background

5. On July 29, 2022 (the “Petition Date”), the Debtor filed an voluntary petition for relief under chapter 11 of the Bankruptcy Code. Melissa Haselden was appointed as the Subchapter V Trustee (“Trustee”).

6. On November 7, 2022 (the “Retention Order”) [Docket No. 265], the Court authorized the retention of JW as counsel to the Trustee. A copy of the Retention Order is attached hereto as **Exhibit 1**.

Case Status Summary

7. The Trustee engaged JW to act as counsel to assist with respect to conducting discovery and investigating the acts, conduct, assets, liabilities, and financial condition of the Debtor and the operation of the Debtor’s business. In addition, the Trustee engaged JW to assist

in uncovering and analyzing potential causes of action. JW's role was predominately focused on assisting the Trustee with the factual investigation into potential claims and liabilities related to the Debtor's estate, asset tracing, and business operations. This investigation included the collection, review, and analysis of relevant financial and business records. It also included conducting the interviews of more than a dozen relevant fact witnesses, including current and former employees and business affiliates, and participating in Rule 2004 examinations of key critical witnesses.

8. JW's efforts were undertaken for the purpose of investigating and analyzing potential assets and information related to the Debtor contained in public filings. JW also analyzed potential adversary actions, claims, and liabilities related to the Debtor's estate to assist the Trustee in assessing their viability to decide whether they should be pursued.

9. JW also assisted in preparing the Trustee's interim status reports to the Court, including the Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation, which details many of the initial findings based on the above-described investigation (the "Report"). JW continues to assist the Trustee, as needed, and in light of work being performed by her other counsel, in fulfilling her investigative duties and obligations as additional information becomes available or relevant.

10. JW has worked with the Trustee to avoid any duplication of effort between its work and any other counsel for the Trustee. JW has in particular endeavored to obtain and share information with the Trustee's other counsel to assist in its separate work related to these proceedings.

11. JW performed legal services for the Trustee pursuant to the Court's authorization and the Trustee's request. All of the legal services for which JW seeks compensation in this Fee

Application were rendered by JW for and on the behalf of the Trustee, and not on behalf of any creditor, or other person.

12. JW seeks compensation of \$326,248.30 in fees, which corresponds to 644.1 hours of work, and \$14,276.25 in expenses.

13. Attached hereto as **Exhibit 2** are the invoices for the legal services rendered to the Trustee. The invoices itemize the services rendered in a format that reflects a description of each service entry, the amount of time spent in rendering the service, the date the service was performed, who performed the service, and the hourly rate of the person performing the service. **Exhibit 2** reflects the reasonable time and expenses incurred in this case for the Application Period.

14. An analysis of the twelve factors affecting the reasonableness of attorneys' fees as set forth in *In the Matter of First Colonial Corp. of America*, 544 F.2d 1291 (5th Cir. 1977), *cert. denied*, 97 S.Ct. 1696 (1977), aids the Court's determination of matters affecting compensation.

- a. Time and labor required. The total number of hours spent by JW in its representation of the Trustee during the Application Period is set forth in **Exhibit 2**. JW devoted the time necessary to efficiently attend to the procedures, correspondence, and pleadings involved. The fees and expenses sought were actual and necessary to represent the Trustee in this case.
- b. Novelty and difficulty of the questions. The questions presented by this case were complex in multiple regards given the complex nature of these proceedings, the nature of the Debtor's business, and the sort of investigation the trustee needed to undertake.
- c. Skill requisite to perform the legal service properly. JW believes that it has superior skills and expertise in bankruptcy matters having practiced in the area of bankruptcy law and litigation for many years. In particular, the JW counsel engaged on this matter have significant litigation-based experience in investigation of and prosecution of director/officer claims, avoidance actions, and similar causes of action. The issues involved in the case have been efficiently handled by JW, as evidenced in time narratives in **Exhibit 2**.
- d. Preclusion of other employment by the attorney due to the acceptance of the case. This was not a factor in this case.

- e. Customary fee. The fees charged are customary and usual fees charged by JW and similar firms in the Houston geographical area for the services rendered by the attorneys and paraprofessionals involved.
- f. Contingent nature of fee. This was not a factor in this case.
- g. Time limitations imposed by the client or other circumstances. This case presented time limitations due to the need for causes of action to be investigated immediately.
- h. Experience, reputation, and ability of attorneys. JW is well-recognized in the community for its legal expertise and abilities in bankruptcy and litigation matters.
- i. Undesirability of the case. This was not a factor in this case.
- j. Nature, length, and professional relationship with client. JW has an ongoing professional relationship with the Trustee.
- k. Awards in similar cases. JW relies on the Court's expertise and knowledge with respect to fee awards in cases. In JW's experience, the fees requested in this Fee Application are comparable and likely less than those in cases similar in subject matter and complexity.
- l. Results obtained. JW interviewed more than a dozen fact witnesses, including current and former employees, participated in the Rule 2004 Examinations of several individuals, including former and current employees and business or marketing affiliates, collected, organized, and reviewed tens of thousands of documents and records from multiple sources, assisted in the preparation of the Trustee's status reports, and identified potential claims and causes of action on behalf of the Debtor and their potential value.

15. The foregoing services rendered on behalf of, and at the request of the Trustee were actual, necessary, and reasonable. Moreover, an application of the twelve factors identified by the *First Colonial* Court to this Fee Application demonstrate that the fees requested are warranted. Therefore, the Fee Application is just and should be granted in its entirety.

Reimbursement for the Preparation of the Fee Application

16. Under the Fifth Circuit decision of *In re First Colonial Corporation of America*, 544 F.2d 1291 (5th Cir.) *cert. denied* 97 S.Ct. 1696 (1977), and subsequent Fifth Circuit decisions detailed applications for compensation are mandated. In 1980, in *Rose Pass Mines v. Howard*,

615 F.2d 1088, the Fifth Circuit condoned the practice of compensating counsel for its efforts in providing the courts and creditors with the required detailed applications.

WHEREFORE, Jackson Walker LLP respectfully requests that the Court: approve this Fee Application; find that the fees requested in this Fee Application are actual and necessary for the reasons set forth herein; award JW (a) \$326,248.30 for professional fees and services provided during the Application period and (b) \$14,276.25 for reimbursement of actual and necessary expenses incurred by JW; and for such other and further relief as the Court deems just.

Houston, Texas
Dated: June 7, 2024

/s/ Jennifer F. Wertz

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Counsel to the Subchapter V Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June 2024 a copy of the foregoing was served via the Court's ECF system upon all parties receiving notice through same.

/s/ Jennifer F. Wertz

Jennifer F. Wertz

Exhibit 1

Retention Order

ENTERED

November 07, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC,

Debtor.

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) Chapter 11
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) Case No. 22-60043
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)**ORDER AUTHORIZING THE RETENTION OF JACKSON WALKER LLP
AS COUNSEL FOR THE SUBCHAPTER V TRUSTEE**

CAME ON FOR CONSIDERATION the Application to Retain Jackson Walker LLP as Counsel the Subchapter V Trustee (the "Application"). Having reviewed the Application and the supporting documents thereto, and finding that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; that the Application was properly filed and served; that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and that venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and based upon good and sufficient cause appearing therefor; the Court ORDERS THAT:

1. The Trustee is authorized to retain and employ Jackson Walker LLP ("Jackson Walker") as counsel upon the terms and conditions set forth in the Application and as modified herein.

2. Jackson Walker shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtor's case in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of the Court. For billing purposes, Jackson Walker shall keep its time in one tenth (1/10) hour increments. Jackson Walker

will use its best effort to avoid any duplication of services provided by any of the other professionals in this case.

3. Jackson Walker will review its files periodically during the pendency of this chapter 11 case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Jackson Walker will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Fed. R. Bankr. P. 2014(a).

4. To the extent that the Application or the Freeman Declaration is inconsistent with this Order, the terms of this Order shall govern.

5. Notwithstanding anything to the contrary in the Application, Jackson Walker shall not be entitled to reimbursement for fees and expenses incurred in connection with any objection to its fees absent further order of this Court.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Signed: November 07, 2022



Christopher Lopez
United States Bankruptcy Judge

Exhibit 2

Invoices

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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) Chapter 11
)
) Case No. 22-60043 (CML)
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**NOTICE OF JACKSON WALKER LLP'S FIRST
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM SEPTEMBER 11, 2022 THROUGH SEPTEMBER 30, 2022**

| | | |
|---|-------------------------------------|--------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | September 11, 2022 | September 30, 2022 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$14,463.36 (80% of \$18,079.20) | |
| Total expenses requested in this Statement: | \$0.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$14,463.36 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$18,079.20 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$17,179.00 | |
| Total actual attorney hours covered by this Statement: | 38.8 | |
| Average hourly rate for attorneys: | \$442.68 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$903.20 | |
| Total actual paraprofessional hours covered by this Statement: | 5.8 | |
| Average hourly rate for paraprofessionals: | \$155.72 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *First Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from September 11, 2022 through September 30, 2022* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$14,463.36 (80% of \$18,079.20) as compensation for professional services rendered to the Trustee during the period from September 11, 2022 through September 30, 2022 (the “Fee Period”). Jackson Walker did not incur any expenses during the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 5, 2023

JACKSON WALKER LLP

Kristhy M. Peguero (TX Bar No. 24102776)
Matthew D. Cavanaugh (TX Bar No. 24062656)
1401 McKinney Street, Suite 1900
Houston, TX 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: kpeguero@jw.com
Email: mcavanaugh@jw.com

Co-Counsel to the Subchapter V Trustee

/s/ Elizabeth C. Freeman

LAW OFFICE OF LIZ FREEMAN

Elizabeth C. Freeman (State Bar No. 24009222)
PO Box 61209
Houston, TX 77208-1209
Telephone: (832) 779-3580
Email: liz@lizfreemanlaw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| TOTAL | \$0.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--------------------------------|-----------------------|-----------------|---------------------------|
| 110 | Case Administration | \$3,661.20 | | |
| 120 | Asset Analysis and Recovery | \$12,954.00 | | |
| 160 | Fee/Employment Applications | \$1,464.00 | | |
| | Totals | \$18,079.20 | \$0.00 | <u>\$18,079.20</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$18,079.20 |
| 20% Fee Holdback for Fee Period | \$3,615.84 |
| 80% of Fees Amount for Fee Period | \$14,463.36 |
| Expenses for Fee Period | \$0.00 |
| TOTAL REQUEST | <u>\$14,463.36</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 09/12/22 | S. Gallagher | 4.5 | 2,214.00 | Meet with Trustee re Alex Jones case to discuss background and strategy. |
| 09/14/22 | D. Trevino | 0.6 | 93.60 | Review docket for deadlines and pleadings and circulate. |
| 09/15/22 | S. Gallagher | 2.3 | 1,131.60 | Attend meeting with chief restructuring officer and trustee regarding state of Free Speech Systems, LLC's business. |
| 09/15/22 | J. Pupo | 0.8 | 118.40 | Process new party names. |
| 09/18/22 | J. Pupo | 0.7 | 103.60 | Compile exhibits and circulated to attorney. |
| Total Case Administration | | 8.9 | \$ 3,661.20 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 09/20/22 | S. Gallagher | 0.6 | 295.20 | Analyze and research potential fraud examiners in anticipation of Court order. |
| 09/21/22 | E. Flynn Meraia | 3.4 | 1,319.20 | Conference with Trustee re discovery, next steps. |
| 09/21/22 | S. Gallagher | 3.4 | 1,672.80 | Meeting with litigation team and Trustee regarding Court ordered investigation (2.1); research potential CRO and CFEs to support bankruptcy in response to court order (.9); confer with potential CFE regarding qualifications (.4). |
| 09/22/22 | E. Flynn Meraia | 3.1 | 1,202.80 | Draft 2004 requests. |
| 09/22/22 | S. Gallagher | 1.6 | 787.20 | Inspect and review documents from PQPR related to FSS on behalf of Trustee. |
| 09/22/22 | S. Gallagher | 0.4 | 196.80 | Continue review and analysis of transactions between PQPR and FSS. |
| 09/22/22 | S. Gallagher | 0.2 | 98.40 | Confer with L. Freeman regarding potential issues with transactions between FSS and PQPR. |
| 09/22/22 | S. Gallagher | 0.4 | 196.80 | Review and analyze 2004 document requests to PQPR. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|---|
| 09/22/22 | S. Gallagher | 0.3 | 147.60 | Telephone conference with potential expert. |
| 09/23/22 | S. Gallagher | 0.6 | 295.20 | Revise 2004 requests for documents to PQPR. |
| 09/23/22 | S. Gallagher | 0.4 | 196.80 | Review and analyze documents received from PQPR and additional documents needed. |
| 09/26/22 | E. Flynn Meraia | 3.2 | 1,241.60 | Telephone conference re company structure (2.0); draft 2004 requests (1.2). |
| 09/26/22 | S. Gallagher | 1.8 | 885.60 | Video conference with Charlie Cicack and Trustee regarding strategic next steps in response to the Court's order denying debtor's counsel's retention application and ordering investigation. |
| 09/26/22 | S. Gallagher | 0.3 | 147.60 | Confer with L. Freeman regarding questions and potential issues in advance of call with C. Cicack. |
| 09/27/22 | D. Trevino | 0.2 | 31.20 | Draft edits to mediation, order and circulate to E Freeman. |
| 09/28/22 | E. Flynn Meraia | 4.3 | 1,668.40 | Draft 2004 requests. |
| 09/28/22 | S. Gallagher | 0.2 | 98.40 | Confer with L. Freeman regarding document requests and documents received. |
| 09/28/22 | D. Trevino | 0.6 | 93.60 | Process documents received from Debtor for attorney review. |
| 09/29/22 | E. Flynn Meraia | 1.4 | 543.20 | Draft 2004 requests. |
| 09/30/22 | E. Flynn Meraia | 0.8 | 310.40 | Draft 2004 requests. |
| 09/30/22 | S. Gallagher | 1.3 | 639.60 | Review and analyze documents received from Free Speech Systems, LLC. |
| 09/30/22 | S. Gallagher | 0.4 | 196.80 | Review and analyze September 23, 2022 hearing transcript and guidance from court regarding investigation. |
| 09/30/22 | S. Gallagher | 1.4 | 688.80 | Analyze and outline areas for investigation and assess remaining documents to be obtained from relevant custodians. |
| Total Asset Analysis and Recovery | | 30.3 | \$ 12,954.00 | |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|---|
| <u>Fee/Employment Applications:</u> | | | | |
| 09/14/22 | E. Flynn Meraia | 1.7 | 659.60 | Draft, revise joinder objection to retention applications (1.2); conference with L. Freeman re case background (.5). |
| 09/15/22 | E. Flynn Meraia | 0.5 | 194.00 | Prepare joinder and witness lists for filing related to retention applications. |
| 09/15/22 | D. Trevino | 0.8 | 124.80 | Draft notice and exhibit list for the 9/20/22 hearing on retention applications (.4); prepare same for filing (.2); review docket and circulate related deadlines (.2). |
| 09/20/22 | S. Gallagher | 0.1 | 49.20 | Review court order regarding retention application. |
| 09/20/22 | S. Gallagher | 0.2 | 98.40 | Receive and respond to communications from L. Freeman and M. Dow regarding Court order and examination. |
| 09/25/22 | K. Gradney | 1.3 | 213.20 | Initial draft of motion to retain M-III Advisory as financial advisor the Subchapter V Trustee. |
| 09/27/22 | D. Trevino | 0.8 | 124.80 | Prepare first draft of Jackson Walker retention application. |
| Total Fee/Employment Applications | | 5.4 | \$ 1,464.00 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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) Chapter 11
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) Case No. 22-60043 (CML)
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**NOTICE OF JACKSON WALKER LLP'S SECOND
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

| | | |
|---|-------------------------------------|------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | October 1, 2022 | October 31, 2022 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$25,578.56 (80% of \$31,973.20) | |
| Total expenses requested in this Statement: | \$9.48 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$25,588.04 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$31,982.68 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$31,098.80 | |
| Total actual attorney hours covered by this Statement: | 48.9 | |
| Average hourly rate for attorneys: | \$635.97 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$874.40 | |
| Total actual paraprofessional hours covered by this Statement: | 4.6 | |
| Average hourly rate for paraprofessionals: | \$190.09 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Second Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from October 1, 2022 through October 31, 2022* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$25,578.56 (80% of \$31,973.20) as compensation for professional services rendered to the Trustee during the period from October 1, 2022 through October 31, 2022 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$9.48, for a total amount of \$25,588.04.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 5, 2023

JACKSON WALKER LLP

Kristhy M. Peguero (TX Bar No. 24102776)
Matthew D. Cavanaugh (TX Bar No. 24062656)
1401 McKinney Street, Suite 1900
Houston, TX 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: kpeguero@jw.com
Email: mcavanaugh@jw.com

Co-Counsel to the Subchapter V Trustee

/s/ Elizabeth C. Freeman

LAW OFFICE OF LIZ FREEMAN

Elizabeth C. Freeman (State Bar No. 24009222)
PO Box 61209
Houston, TX 77208-1209
Telephone: (832) 779-3580
Email: liz@lizfreemanlaw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| Lexis Research | \$9.48 |
| TOTAL | \$9.48 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-----------------|---------------------------|
| 110 | Case Administration | \$429.60 | | |
| 120 | Asset Analysis and Recovery | \$29,720.40 | | |
| 150 | Meetings and Communications with Creditors | \$38.40 | | |
| 160 | Fee/Employment Applications | \$344.80 | | |
| 230 | Financing and Cash Collateral | \$1,420.80 | | |
| 320 | Plan and Disclosure Statement | \$19.20 | | |
| | Totals | \$31,973.20 | \$9.48 | <u>\$31,982.68</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$31,973.20 |
| 20% Fee Holdback for Fee Period | \$6,394.64 |
| 80% of Fees Amount for Fee Period | \$25,578.56 |
| Expenses for Fee Period | \$9.48 |
| TOTAL REQUEST | <u>\$25,588.04</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 10/06/22 | J. Pupo | 0.1 | 18.40 | Circulated supplemental party names report. |
| 10/11/22 | S. Gallagher | 0.4 | 219.20 | Draft and revise status report update from client. |
| 10/11/22 | D. Trevino | 0.5 | 96.00 | Compile and organize documents and pleadings in iManage. |
| 10/11/22 | D. Trevino | 0.3 | 57.60 | Revise Trustee status report (.2); finalize same for filing (.1). |
| 10/31/22 | D. Trevino | 0.2 | 38.40 | Attention to the docket regarding dischargeability deadline, calendar same. |
| Total Case Administration | | 1.5 | \$ 429.60 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 10/03/22 | E. Flynn Meraia | 2.1 | 949.20 | Revise discovery requests. |
| 10/03/22 | S. Gallagher | 0.3 | 164.40 | Draft discovery email to J. Pupo regarding assessment of documents received. |
| 10/03/22 | S. Gallagher | 0.3 | 164.40 | Draft email to L. Freeman regarding litigation strategy and next steps. |
| 10/03/22 | S. Gallagher | 0.5 | 274.00 | Confer with L. Freeman regarding next steps and strategy. |
| 10/03/22 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents received from FSS. |
| 10/03/22 | J. Pupo | 0.2 | 36.80 | Confer with S Gallagher regarding assessment of documents received. |
| 10/04/22 | E. Flynn Meraia | 1.4 | 632.80 | Draft, revise discovery requests |
| 10/04/22 | S. Gallagher | 4.7 | 2,575.60 | Attend interview of Bob Roe and confer with counsel for PQPR, FSS, and tort plaintiffs post-interview. |
| 10/04/22 | S. Gallagher | 0.6 | 328.80 | Confer with L. Freeman and Trustee post-interview regarding strategic next steps. |
| 10/04/22 | S. Gallagher | 0.3 | 164.40 | Analyze and revise 2004 requests to credit card processor. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 10/05/22 | S. Gallagher | 1.7 | 931.60 | Draft and revise 2004 requests for production based on additional information obtained from PQPR interview. |
| 10/05/22 | S. Gallagher | 1.2 | 657.60 | Review and analyze notes from witness interview and documents received in support analysis of potential claims and areas to focus investigation. |
| 10/06/22 | S. Gallagher | 0.9 | 493.20 | Review and revise 2004 requests to FSS and PQPR. |
| 10/06/22 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding 2004 requests. |
| 10/06/22 | S. Gallagher | 0.2 | 109.60 | Draft email to client regarding 2004 requests. |
| 10/07/22 | S. Gallagher | 1.4 | 767.20 | Revise, redact, and finalize 2004 requests to FSS and PQPR. |
| 10/07/22 | S. Gallagher | 0.2 | 109.60 | Review and respond to emails from client regarding notice and service of 2004 requests. |
| 10/07/22 | J. Pupo | 0.7 | 128.80 | Prepared notice of 2004 Requests. |
| 10/10/22 | S. Gallagher | 0.2 | 109.60 | Draft email to trustee regarding 2004 requests. |
| 10/11/22 | S. Gallagher | 0.2 | 109.60 | Review and respond to communications with tort plaintiffs' counsel regarding document production. |
| 10/11/22 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents received from PQPR and FSS and outstanding documents requested. |
| 10/11/22 | S. Gallagher | 0.1 | 54.80 | Draft email to tort plaintiffs regarding document production. |
| 10/11/22 | S. Gallagher | 0.1 | 54.80 | Draft email to PQPR regarding document production and outstanding requests. |
| 10/11/22 | D. Trevino | 0.1 | 19.20 | Attention to 2004 requests, docket deadlines. |
| 10/12/22 | S. Gallagher | 0.3 | 164.40 | Telephone call with counsel for tort plaintiffs regarding document production. |
| 10/12/22 | S. Gallagher | 0.8 | 438.40 | Review documents received from parties and third parties to the bankruptcy. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 10/17/22 | S. Gallagher | 0.3 | 164.40 | Meet and confer with financial advisor regarding document review and high priority items. |
| 10/17/22 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding litigation strategy and high priority items to financial advisors. |
| 10/18/22 | S. Gallagher | 0.9 | 493.20 | Review and provide relevant financial information to financial advisor. |
| 10/18/22 | S. Gallagher | 0.2 | 109.60 | Confer with Liz Freeman regarding outstanding document requests and documents to provide to financial advisor. |
| 10/19/22 | S. Gallagher | 1.4 | 767.20 | Review documents and financial records and provide relevant information to expert. |
| 10/20/22 | E. Freeman | 4.0 | 3,360.00 | Review documents produced by parties as part of the investigation. |
| 10/20/22 | S. Gallagher | 1.8 | 986.40 | Review and analyze documents from FSS and provide relevant financial information to financial advisor. |
| 10/20/22 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding 2004 requests and additional discovery, including discovery served by Plaintiffs on PQPR. |
| 10/20/22 | S. Gallagher | 0.3 | 164.40 | Review and process additional documents received from PQPR. |
| 10/21/22 | E. Freeman | 2.2 | 1,848.00 | Review documents produced by parties as part of the investigation. |
| 10/24/22 | E. Freeman | 1.0 | 840.00 | Confer with counsel for the parties regarding case status and settlement. |
| 10/24/22 | S. Gallagher | 0.7 | 383.60 | Telephone conference with Liz Freeman regarding document production and requests from parties re 2004 requests. |
| 10/24/22 | S. Gallagher | 0.5 | 274.00 | Review document production received from tort plaintiffs. |
| 10/24/22 | S. Gallagher | 0.3 | 164.40 | Draft and respond to email communications with counsel for tort plaintiffs requesting additional documents. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 10/24/22 | S. Gallagher | 0.4 | 219.20 | Receipt and respond to multiple email communications with counsel for tort plaintiffs regarding outstanding 2004 requests. |
| 10/24/22 | S. Gallagher | 0.1 | 54.80 | Telephone call to counsel for tort plaintiffs. |
| 10/25/22 | E. Freeman | 2.3 | 1,932.00 | Review discovery responsive materials. |
| 10/25/22 | S. Gallagher | 0.3 | 164.40 | Telephone call with counsel for tort plaintiffs, Ryan Chapple, regarding 2004 requests. |
| 10/26/22 | E. Freeman | 2.9 | 2,436.00 | Review proposed agreements (.4); review discovery responses (2.5). |
| 10/26/22 | S. Gallagher | 0.3 | 164.40 | Review and analyze proposed agreement from PQPR's counsel regarding document production and provide analysis to client. |
| 10/27/22 | E. Freeman | 3.0 | 2,520.00 | Attend meeting regarding investigation. |
| 10/27/22 | S. Gallagher | 1.3 | 712.40 | Telephone conference with Trustee and E. Freeman regarding document collection and investigation strategy. |
| 10/31/22 | E. Flynn Meraia | 3.4 | 1,536.80 | Research re contribution (2.8); draft summary re same (.6) |
| 10/31/22 | S. Gallagher | 0.4 | 219.20 | Telephone conversation with counsel for tort plaintiffs regarding additional document production. |
| Total Asset Analysis and Recovery | | 47.9 | \$ 29,720.40 | |

Meetings of and Communications with Creditors:

| | | | | |
|---|------------|-----|----------|---|
| 10/12/22 | D. Trevino | 0.2 | 38.40 | Attention to docket regarding the hearing on motion to appoint tort claims, calendar dates. |
| Total Meetings of and Communications with Creditors | | 0.2 | \$ 38.40 | |

Fee/Employment Applications:

| | | | | |
|----------|------------|-----|--------|--|
| 10/04/22 | J. Pupo | 0.1 | 18.40 | Compiled motion and exhibits on the issue of disinterestedness on application to employ. |
| 10/11/22 | D. Trevino | 1.3 | 249.60 | Draft and finalize for filing retention application for Jackson Walker. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|---|
| 10/20/22 | D. Trevino | 0.2 | 38.40 | Attention to docket regarding the filed retention applications, docket deadlines. |
| 10/28/22 | D. Trevino | 0.2 | 38.40 | Attention to docket regarding fee applications of Shannon & Lee and Schwartz, and calculate and docket related deadlines. |
| Total Fee/Employment Applications | | 1.8 | \$ 344.80 | |
| <u>Financing/Cash Collections:</u> | | | | |
| 10/10/22 | D. Trevino | 0.1 | 19.20 | Docket hearing date on cash collateral and related deadlines. |
| 10/12/22 | E. Freeman | 1.6 | 1,344.00 | Attend the hearing on use of cash collateral (.5); confer with counsel for the various creditors and the debtor (1.1). |
| 10/12/22 | D. Trevino | 0.2 | 38.40 | Attention to docket and deadlines on cash collateral hearings and motions to reconsider. |
| 10/26/22 | D. Trevino | 0.1 | 19.20 | Attention to docket on cash collateral hearing, calendar same. |
| Total Financing/Cash Collections | | 2.0 | \$ 1,420.80 | |
| <u>Plan and Disclosure Statement (including Business Plan):</u> | | | | |
| 10/21/22 | D. Trevino | 0.1 | 19.20 | Review the motion to extend exclusivity and docket related deadlines. |
| Total Plan and Disclosure Statement (including Business Plan) | | 0.1 | \$ 19.20 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

)
)
)
)
)
)
)

Chapter 11

FREE SPEECH SYSTEMS LLC

Case No. 22-60043 (CML)

Debtor.

**NOTICE OF JACKSON WALKER LLP'S THIRD
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

| | | |
|---|-------------------------------------|-------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | November 1, 2022 | November 30, 2022 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$13,870.08 (80% of \$17,337.60) | |
| Total expenses requested in this Statement: | \$8.26 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$13,878.34 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$17,345.86 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$16,904.80 | |
| Total actual attorney hours covered by this Statement: | 24.7 | |
| Average hourly rate for attorneys: | \$684.40 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$432.80 | |
| Total actual paraprofessional hours covered by this Statement: | 2.3 | |
| Average hourly rate for paraprofessionals: | \$188.17 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Third Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from November 1, 2022 through November 30, 2022* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$13,870.08 (80% of \$17,337.60) as compensation for professional services rendered to the Trustee during the period from November 1, 2022 through November 30, 2022 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$8.26, for a total amount of \$13,878.34.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 5, 2023

JACKSON WALKER LLP

Kristhy M. Peguero (TX Bar No. 24102776)
Matthew D. Cavanaugh (TX Bar No. 24062656)
1401 McKinney Street, Suite 1900
Houston, TX 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: kpeguero@jw.com
Email: mcavanaugh@jw.com

Co-Counsel to the Subchapter V Trustee

/s/ Elizabeth C. Freeman

LAW OFFICE OF LIZ FREEMAN

Elizabeth C. Freeman (State Bar No. 24009222)
PO Box 61209
Houston, TX 77208-1209
Telephone: (832) 779-3580
Email: liz@lizfreemanlaw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| Lexis Research | \$8.26 |
| TOTAL | \$8.26 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-----------------|--------------------|
| 110 | Case Administration | \$40.00 | | |
| 120 | Asset Analysis and Recovery | \$8,784.00 | | |
| 150 | Meetings and Communications with Creditors | \$1,680.00 | | |
| 160 | Fee/Employment Applications | \$6,684.80 | | |
| 230 | Financing and Cash Collateral | \$38.40 | | |
| 310 | Claims Administration and Objections | \$110.40 | | |
| | Totals | \$17,337.60 | \$8.26 | \$17,345.86 |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$17,337.60 |
| 20% Fee Holdback for Fee Period | \$3,467.52 |
| 80% of Fees Amount for Fee Period | \$13,870.08 |
| Expenses for Fee Period | \$8.26 |
| TOTAL REQUEST | <u>\$13,878.34</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 11/21/22 | K. Gradney | 0.2 | 40.00 | Prepare for filing Trustee status report. |
| Total Case Administration | | 0.2 | \$ 40.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 11/03/22 | E. Freeman | 2.0 | 1,680.00 | Review documents related to the investigation. |
| 11/09/22 | E. Freeman | 2.0 | 1,680.00 | Discovery work on report |
| 11/10/22 | E. Freeman | 1.7 | 1,428.00 | Work on the report. |
| 11/11/22 | E. Freeman | 1.3 | 1,092.00 | Work on the report. |
| 11/21/22 | E. Flynn Meraia | 4.0 | 1,808.00 | Draft 2004 requests (3.4); research re cryptocurrency (.6). |
| 11/21/22 | S. Gallagher | 0.8 | 438.40 | Revise 2004 requests to Alex Jones. |
| 11/21/22 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents received from Alex Jones. |
| 11/28/22 | S. Gallagher | 0.2 | 109.60 | Draft email to Steve Lemmon regarding outstanding document production. |
| 11/30/22 | S. Gallagher | 0.3 | 164.40 | Confer with counsel for PQPR regarding document production. |
| 11/30/22 | S. Gallagher | 0.3 | 164.40 | Receipt and review of multiple email communications from counsel for PQPR. |
| Total Asset Analysis and Recovery | | 13.0 | \$ 8,784.00 | |
| <u>Meetings of and Communications with Creditors:</u> | | | | |
| 11/02/22 | E. Freeman | 2.0 | 1,680.00 | Confer with counsel for creditors. |
| Total Meetings of and Communications with Creditors | | 2.0 | \$ 1,680.00 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 11/01/22 | E. Freeman | 1.3 | 1,092.00 | Work on retention. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|--|
| 11/07/22 | E. Freeman | 1.0 | 840.00 | Review documents related to the investigation. |
| 11/07/22 | E. Flynn Meraia | 4.4 | 1,988.80 | Draft, revise fee applications objection. |
| 11/08/22 | E. Freeman | 3.0 | 2,520.00 | Work on discovery and retention. |
| 11/08/22 | D. Trevino | 0.1 | 19.20 | Attention to docket regarding hearing on motions to reconsider, update calendar. |
| 11/18/22 | J. Pupo | 0.3 | 55.20 | Edited and circulated motion to retain M3 |
| 11/18/22 | D. Trevino | 0.5 | 96.00 | Communicate with team and E. Freeman regarding the compiling of the application to employ M-III (.1); edits to the application and EL (.4). |
| 11/19/22 | J. Pupo | 0.4 | 73.60 | Finalize for filing of application to retain M III. |
| Total Fee/Employment Applications | | 11.0 | \$ 6,684.80 | |
| <u>Financing/Cash Collections:</u> | | | | |
| 11/15/22 | D. Trevino | 0.2 | 38.40 | Review motion seeking order authorizing the debtor into a financial services agreement, and docket related deadlines. |
| Total Financing/Cash Collections | | 0.2 | \$ 38.40 | |
| <u>Claims Administration and Objections:</u> | | | | |
| 11/14/22 | J. Pupo | 0.6 | 110.40 | Edits to objection to administrative expense claim (.4); circulated for approval (.1); prepared for filing and circulated file stamped copy (.1) |
| Total Claims Administration and Objections | | 0.6 | \$ 110.40 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

)
) Chapter 11
)
) Case No. 22-60043 (CML)
)
)
)

**NOTICE OF JACKSON WALKER LLP'S FOURTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

| | | |
|---|-------------------------------------|-------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | December 1, 2022 | December 31, 2022 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$4,529.92 (80% of \$5,662.40) | |
| Total expenses requested in this Statement: | \$0.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$4,529.92 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$5,662.40 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$4,590.40 | |
| Total actual attorney hours covered by this Statement: | 9.2 | |
| Average hourly rate for attorneys: | \$498.96 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$1,072.00 | |
| Total actual paraprofessional hours covered by this Statement: | 5.6 | |
| Average hourly rate for paraprofessionals: | \$191.43 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Fourth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from December 1, 2022 through December 31, 2022* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$4,529.92 (80% of \$5,662.40) as compensation for professional services rendered to the Trustee during the period from December 1, 2022 through December 31, 2022 (the “Fee Period”). JW did not incur any expenses for the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: April 2, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| TOTAL | \$0.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---|-----------------------|-----------------|--------------------------|
| 110 | Case Administration | \$1,702.00 | | |
| 120 | Asset Analysis and Recovery | \$2,466.00 | | |
| 140 | Relief from Stay and Adequate Protection | \$92.00 | | |
| 160 | Fee/Employment Applications | \$1,402.40 | | |
| | Totals | \$5,662.40 | \$0.00 | <u>\$5,662.40</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$5,662.40 |
| 20% Fee Holdback for Fee Period | \$1,132.48 |
| 80% of Fees Amount for Fee Period | \$4,529.92 |
| Expenses for Fee Period | \$0.00 |
| TOTAL REQUEST | <u>\$4,529.92</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 12/05/22 | D. Trevino | 0.1 | 19.20 | Review notice of status conference and docket same including any related deadlines. |
| 12/06/22 | E. Flynn Meraia | 0.4 | 180.80 | Draft joinder objection to joint administration motion. |
| 12/07/22 | E. Flynn Meraia | 2.1 | 949.20 | Conference with L. Freeman, counsel to A. Jones (1.5); telephonically attend hearing (.6) |
| 12/07/22 | J. Pupo | 0.8 | 147.20 | Coordinate notices of appearance. |
| 12/09/22 | J. Pupo | 0.2 | 36.80 | Update WIP report for upcoming deadlines. |
| 12/12/22 | J. Pupo | 0.2 | 36.80 | Prepare for filing of notice of appearance. |
| 12/12/22 | D. Trevino | 0.1 | 19.20 | Correspon with E Freeman regarding notice of appearance. |
| 12/14/22 | E. Flynn Meraia | 0.4 | 180.80 | Revise joint administrative objection joinder (.3); prepare same for filing (.1). |
| 12/14/22 | D. Trevino | 0.1 | 19.20 | Prepare for filing the joinder to objection to motion for joint administration of the Alex Jones case. |
| 12/16/22 | J. Pupo | 0.3 | 55.20 | Review docket for upcoming hearing dates and calculate and docket related deadlines. |
| 12/16/22 | D. Trevino | 0.2 | 38.40 | Correspond with E. Meraia regarding prior hearing transcripts. |
| 12/19/22 | D. Trevino | 0.1 | 19.20 | Calendar related deadlines for status conference to be held on 1/20/23. |
| Total Case Administration | | 5.0 | \$ 1,702.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 12/12/22 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding additional documents outstanding from PQPR and FSS. |
| 12/12/22 | S. Gallagher | 0.1 | 54.80 | Draft email to S. Lemmon regarding PQPR missing documents. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 12/13/22 | S. Gallagher | 0.1 | 54.80 | Confer with S Lemmon regarding document production and investigation. |
| 12/13/22 | S. Gallagher | 0.3 | 164.40 | Confer with L Freeman regarding additional documents to be collected from PQPR and letter agreement regarding document confidentiality. |
| 12/14/22 | S. Gallagher | 0.4 | 219.20 | Telephone conference with counsel for PQPR regarding additional document production. |
| 12/14/22 | S. Gallagher | 0.2 | 109.60 | Review and respond to email from R Mates regarding production of documents and format of production. |
| 12/15/22 | S. Gallagher | 0.1 | 54.80 | Correspon with counsel for PQPR regarding additional document production. |
| 12/15/22 | S. Gallagher | 0.1 | 54.80 | Additional correspondence from PQPR regarding additional documents. |
| 12/15/22 | S. Gallagher | 0.3 | 164.40 | Confer with counsel for PQPR regarding additional document production and form of production. |
| 12/15/22 | S. Gallagher | 0.2 | 109.60 | Correspond with counsel for PQPR regarding confidentiality of documents and supplemental production. |
| 12/15/22 | S. Gallagher | 0.1 | 54.80 | Draft email to PQPR following up on document production. |
| 12/15/22 | S. Gallagher | 0.2 | 109.60 | Telephone conference with counsel for PQPR regarding format of production. |
| 12/15/22 | S. Gallagher | 0.1 | 54.80 | Correspond with M3 regarding additional documents. |
| 12/16/22 | S. Gallagher | 0.3 | 164.40 | Confer with L Freeman regarding scope of document collection for PQPR and collection of documents. |
| 12/16/22 | S. Gallagher | 0.3 | 164.40 | Review and respond to communications from PQPR regarding document collection, scope of production, and document production. |
| 12/19/22 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents produced by PQPR. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 12/19/22 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding supplemental document production. |
| 12/22/22 | S. Gallagher | 0.1 | 54.80 | Draft email to PQPR's counsel regarding scope of confidentiality. |
| 12/29/22 | S. Gallagher | 0.1 | 54.80 | Review and respond to communication from counsel for Alex Jones. |
| 12/29/22 | S. Gallagher | 0.1 | 54.80 | Draft follow-up email to counsel for PQPR requesting additional document production. |
| 12/30/22 | S. Gallagher | 0.4 | 219.20 | Review and analyze supplemental documents received from counsel for PQPR. |
| 12/30/22 | S. Gallagher | 0.1 | 54.80 | Draft email to client regarding update to production file from PQPR and supplemental documents received. |
| Total Asset Analysis and Recovery | | 4.5 | \$ 2,466.00 | |

Relief from Stay/Adequate Protection Proceedings:

| | | | | |
|--|---------|-----|----------|--|
| 12/15/22 | J. Pupo | 0.5 | 92.00 | Correspond regarding witness and exhibit list for hearing on emergency motion to modify the automatic stay (.2); prepare same for filing (.3). |
| Total Relief from Stay/Adequate Protection Proceedings | | 0.5 | \$ 92.00 | |

Fee/Employment Applications:

| | | | | |
|----------|-----------------|-----|--------|--|
| 12/08/22 | K. Gradney | 1.5 | 300.00 | Prepare September monthly fee statement. |
| 12/12/22 | J. Pupo | 0.3 | 55.20 | Draft witness and exhibit list for objection to M3 retention. |
| 12/14/22 | J. Pupo | 0.3 | 55.20 | Correspond regarding objection deadline for the application to employ M-III. |
| 12/15/22 | E. Flynn Meraia | 0.8 | 361.60 | Draft response to objection to M3 retention. |
| 12/16/22 | E. Flynn Meraia | 1.0 | 452.00 | Research re fee caps (.8); revise response re M3 objection (.2). |
| 12/16/22 | D. Trevino | 0.1 | 19.20 | Correspond with E Freeman regarding motion to retain M3. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 12/16/22 | D. Trevino | 0.1 | 19.20 | Review and prepare for filing the Trustee's response to PQPR Holdings objection to retention application of M3 Advisory. |
| 12/20/22 | K. Gradney | 0.7 | 140.00 | Update monthly fee statements. |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

)
) Chapter 11
)
) Case No. 22-60043 (CML)
)
)
)

**NOTICE OF JACKSON WALKER LLP'S FIFTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM JANUARY 31, 2023 THROUGH JANUARY 31, 2023**

| | | |
|---|-------------------------------------|------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | January 31, 2023 | January 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$7,898.24 (80% of \$9,872.80) | |
| Total expenses requested in this Statement: | \$51.68 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$7,949.92 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$9,924.48 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$9,029.60 | |
| Total actual attorney hours covered by this Statement: | 16.6 | |
| Average hourly rate for attorneys: | \$543.95 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$843.20 | |
| Total actual paraprofessional hours covered by this Statement: | 4.4 | |
| Average hourly rate for paraprofessionals: | \$191.64 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Fifth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from January 1, 2023 through January 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$7,898.24 (80% of \$9,872.80) as compensation for professional services rendered to the Trustee during the period from January 1, 2023 through January 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$51.68, for a total amount of \$7,949.92.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: April 2, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|-----------------|----------------|
| Copying Expense | \$26.60 |
| Postage | \$25.08 |
| TOTAL | \$51.68 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIODS**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---|-----------------------|-----------------|--------------------------|
| 110 | Case Administration | \$2,195.60 | | |
| 120 | Asset Analysis and Recovery | \$7,124.00 | | |
| 160 | Fee/Employment Applications | \$196.80 | | |
| 185 | Assumption and Rejection of Leases and Contracts | \$40.00 | | |
| 220 | Employee Benefits and Pensions | \$316.40 | | |
| | Totals | \$9,872.80 | \$51.68 | <u>\$9,924.48</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$9,872.80 |
| 20% Fee Holdback for Fee Period | \$1,974.56 |
| 80% of Fees Amount for Fee Period | \$7,898.24 |
| Expenses for Fee Period | \$51.68 |
| TOTAL REQUEST | <u>\$7,949.92</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 01/03/23 | D. Trevino | 0.4 | 76.80 | Correspond with L Freeman regarding recently filed notices of appearance. |
| 01/04/23 | J. Pupo | 1.0 | 184.00 | Update works in progress list with upcoming deadlines. |
| 01/18/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communications from M3. |
| 01/18/23 | D. Trevino | 0.2 | 38.40 | Review and prepare for filing the witness and exhibit list for the 1/20/2023 hearing. |
| 01/19/23 | S. Gallagher | 0.2 | 109.60 | Correspond with L. Freeman in preparation for client call. |
| 01/19/23 | D. Trevino | 0.8 | 153.60 | Prepare Trustee's third interim status report with redactions and finalize for filing. |
| 01/20/23 | S. Gallagher | 2.1 | 1,150.80 | Monitor hearing on application for compensation, motion to reconsider, and status conference regarding Alex Jones bankruptcy. |
| 01/24/23 | S. Gallagher | 0.1 | 54.80 | Review and respond to communications from PQPR's counsel. |
| 01/30/23 | S. Gallagher | 0.3 | 164.40 | Draft status report regarding recently obtained documents and relevant findings. |
| 01/30/23 | D. Trevino | 0.8 | 153.60 | Process documents received by client. |
| 01/31/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communication from Trustee |
| Total Case Administration | | 6.1 | \$ 2,195.60 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 01/04/23 | S. Gallagher | 0.4 | 219.20 | Draft potential search terms for document production re PQPR. |
| 01/06/23 | S. Gallagher | 0.1 | 54.80 | Review request from PQPR counsel regarding document production. |
| 01/06/23 | S. Gallagher | 0.1 | 54.80 | Confer with L. Freeman regarding document collection. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 01/10/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze production received from PQPR and provided to M3. |
| 01/10/23 | S. Gallagher | 0.1 | 54.80 | Correspond with M3 regarding document production and review. |
| 01/17/23 | S. Gallagher | 1.7 | 931.60 | Review and analyze production and correspondence history with PQPR. |
| 01/17/23 | S. Gallagher | 0.7 | 383.60 | Draft update summarizing legal analyses, document production, and recommendations to L. Freeman. |
| 01/17/23 | S. Gallagher | 0.1 | 54.80 | Correspond with forensic expert regarding documents. |
| 01/17/23 | S. Gallagher | 0.1 | 54.80 | Draft email to PQPR counsel regarding search terms. |
| 01/18/23 | S. Gallagher | 0.2 | 109.60 | Confer with client regarding status report and update. |
| 01/18/23 | S. Gallagher | 0.3 | 164.40 | Review and analyze supplemental production from PQPR. |
| 01/19/23 | S. Gallagher | 1.0 | 548.00 | Correspond with Trustee and L. Freeman regarding upcoming hearing and status conference and report to Court. |
| 01/25/23 | S. Gallagher | 0.7 | 383.60 | Attend meeting with counsel for PQPR regarding document production. |
| 01/25/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding document production and investigation. |
| 01/25/23 | S. Gallagher | 0.4 | 219.20 | Review additional documents received from PQPR regarding FSS and AJ assets. |
| 01/26/23 | S. Gallagher | 2.0 | 1,096.00 | Draft 2004 requests to ESG. |
| 01/26/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding 2004 Request to former FSS employee and scope of discovery. |
| 01/26/23 | S. Gallagher | 0.8 | 438.40 | Review and analyze documents received and prior 2004 requests and production to assess additional documents to be obtained. |
| 01/30/23 | S. Gallagher | 2.6 | 1,424.80 | Review and analyze documents received from PQPR and fact witnesses regarding FSS assets and PQPR assets. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|--|
| 01/30/23 | S. Gallagher | 0.1 | 54.80 | Correspond with M3 regarding supplemental document production. |
| 01/30/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding document review and relevant findings. |
| 01/31/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communication from M3 regarding document review and assessment. |
| 01/31/23 | S. Gallagher | 0.3 | 164.40 | Review documents received in response to email request from Trustee. |
| Total Asset Analysis and Recovery | | 13.0 | \$ 7,124.00 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 01/03/23 | D. Trevino | 0.1 | 19.20 | Correspond with L Freeman regarding retention applications. |
| 01/03/23 | D. Trevino | 0.3 | 57.60 | Revise retention application of Freeman Law. |
| 01/05/23 | K. Gradney | 0.6 | 120.00 | Finalize Jackson Walker September, October and November fee statements for service. |
| Total Fee/Employment Applications | | 1.0 | \$ 196.80 | |
| <u>Assumption/Rejection of Leases and Contracts:</u> | | | | |
| 01/11/23 | K. Gradney | 0.2 | 40.00 | Prepare to file joint limited objection to A Jones motion to set bar date for assumption and rejection of executory contracts. |
| Total Assumption/Rejection of Leases and Contracts | | 0.2 | \$ 40.00 | |
| <u>Employee Benefits/Pensions:</u> | | | | |
| 01/10/23 | E. Flynn Meraia | 0.7 | 316.40 | Draft objection to A. Jones motion to compel employment contract. |
| Total Employee Benefits/Pensions | | 0.7 | \$ 316.40 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

)
) Chapter 11
)
) Case No. 22-60043 (CML)
)
)
)

**NOTICE OF JACKSON WALKER LLP'S SIXTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

| | | |
|---|-------------------------------------|-------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | February 1, 2023 | February 28, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$11,839.68 (80% of \$14,799.60) | |
| Total expenses requested in this Statement: | \$0.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$11,839.68 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$14,799.60 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$14,193.20 | |
| Total actual attorney hours covered by this Statement: | 25.9 | |
| Average hourly rate for attorneys: | \$548.00 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$606.40 | |
| Total actual paraprofessional hours covered by this Statement: | 2.9 | |
| Average hourly rate for paraprofessionals: | \$209.10 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Sixth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period from February 1, 2023 through February 28, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$11,839.68 (80% of \$14,799.60) as compensation for professional services rendered to the Trustee during the period from February 1, 2023 through February 28, 2023 (the “Fee Period”). JW did not incur any expenses during the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: April 14, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| TOTAL | \$0.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-----------------|---------------------------|
| 110 | Case Administration | \$1,488.00 | | |
| 120 | Asset Analysis and Recovery | \$12,935.60 | | |
| 130 | Asset Disposition | \$38.40 | | |
| 140 | Relief from Stay and Adequate Protection | \$219.20 | | |
| 150 | Meetings and Communications with Creditors | \$19.20 | | |
| 160 | Fee/Employment Applications | \$99.20 | | |
| | Totals | \$14,799.60 | \$0.00 | <u>\$14,799.60</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$14,799.60 |
| 20% Fee Holdback for Fee Period | \$2,959.92 |
| 80% of Fees Amount for Fee Period | \$11,839.68 |
| Expenses for Fee Period | \$0.00 |
| TOTAL REQUEST | <u>\$11,839.68</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 02/03/23 | S. Gallagher | 0.9 | 493.20 | Telephone conference with L. Freeman and trustee regarding next steps. |
| 02/13/23 | D. Trevino | 0.5 | 96.00 | Draft witness and exhibit list for the 2/14/2023 (.2); compile and prepare for filing (.3). |
| 02/15/23 | D. Trevino | 0.4 | 76.80 | Review the docket for various motions and deadlines, calculate and docket same. |
| 02/21/23 | S. Gallagher | 0.4 | 219.20 | Review index of documents received. |
| 02/24/23 | S. Gallagher | 1.1 | 602.80 | Strategy meeting with M3, bankruptcy counsel, and Trustee. |
| Total Case Administration | | 3.3 | \$ 1,488.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 02/01/23 | S. Gallagher | 0.1 | 54.80 | Correspond with L. Freeman regarding discovery requests. |
| 02/01/23 | S. Gallagher | 0.1 | 54.80 | Correspond with M3 regarding document review. |
| 02/01/23 | S. Gallagher | 0.1 | 54.80 | Correspond with Trustee regarding documents received related to FSS and Alex Jones. |
| 02/01/23 | S. Gallagher | 0.8 | 438.40 | Review and analyze documents received from all parties related to debtors' assets. |
| 02/03/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze protective order. |
| 02/03/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding protective order and 2004 requests to other parties. |
| 02/03/23 | S. Gallagher | 0.2 | 109.60 | Review documents provided to M3. |
| 02/03/23 | S. Gallagher | 0.3 | 164.40 | Analysis of potential additional discovery re identification of assets of relevant parties. |
| 02/03/23 | S. Gallagher | 0.2 | 109.60 | Revise and finalize discovery requests. |
| 02/03/23 | K. Gradney | 0.8 | 160.00 | Revise 2004 requests. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 02/06/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee and L. Freeman regarding assessment of assets. |
| 02/07/23 | S. Gallagher | 0.2 | 109.60 | Revise 2004 request. |
| 02/07/23 | S. Gallagher | 0.2 | 109.60 | Review and analyze documents received to identify additional relevant parties to 2004 request. |
| 02/07/23 | S. Gallagher | 0.1 | 54.80 | Draft email to Trustee regarding 2004 requests. |
| 02/10/23 | S. Gallagher | 0.3 | 164.40 | Review and analyze M3 draft update. |
| 02/10/23 | S. Gallagher | 0.1 | 54.80 | Draft investigation status update for M3. |
| 02/13/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman and trustee regarding additional 2004 requests and investigation. |
| 02/13/23 | S. Gallagher | 0.8 | 438.40 | Review notes and documents received in support of additional 2004 requests. |
| 02/13/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee regarding 2004 requests. |
| 02/13/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding document collection and additional documents. |
| 02/13/23 | S. Gallagher | 0.1 | 54.80 | Draft email to counsel for interested party seeking information regarding additional documents. |
| 02/13/23 | S. Gallagher | 2.8 | 1,534.40 | Review and analyze documents received in support of asset analysis. |
| 02/14/23 | S. Gallagher | 1.2 | 657.60 | Confer with trustee and M3 team regarding document collection and analysis. |
| 02/14/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze initial report and opinions from M3, including document index. |
| 02/14/23 | S. Gallagher | 0.8 | 438.40 | Review and compare documents provided to M3 against documents received to confirm relevant information has been provided. |
| 02/14/23 | S. Gallagher | 0.3 | 164.40 | Draft email to M3 with supplemental documents. |
| 02/15/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee regarding asset analysis and meeting with CRO. |
| 02/15/23 | S. Gallagher | 0.3 | 164.40 | Review and respond to communications from PQPR's counsel regarding document collection and production. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 02/16/23 | S. Gallagher | 0.1 | 54.80 | Confer with counsel for PQPR regarding document collection. |
| 02/16/23 | S. Gallagher | 1.5 | 822.00 | Confer with M3 regarding document collection and strategy. |
| 02/16/23 | S. Gallagher | 0.8 | 438.40 | Review documents regarding missing items from M3 meeting. |
| 02/16/23 | S. Gallagher | 0.8 | 438.40 | Conference with Trustee and L. Freeman regarding investigation strategy and next steps. |
| 02/16/23 | S. Gallagher | 1.3 | 712.40 | Review documents received and attention to index of files. |
| 02/20/23 | S. Gallagher | 0.7 | 383.60 | Review documents received to assess missing documents. |
| 02/20/23 | S. Gallagher | 0.3 | 164.40 | Review and respond to email from counsel for PQPR regarding supplemental document production and missing production. |
| 02/21/23 | S. Gallagher | 1.6 | 876.80 | Review and analyze financial documents received and assess potential assets. |
| 02/21/23 | S. Gallagher | 0.2 | 109.60 | Draft summary report to client with assessments regarding documents received. |
| 02/21/23 | S. Gallagher | 0.6 | 328.80 | Confer with counsel for PQPR regarding document production and additional supplemental productions. |
| 02/21/23 | S. Gallagher | 0.3 | 164.40 | Confer with M3 and Trustee regarding asset analysis. |
| 02/21/23 | S. Gallagher | 0.2 | 109.60 | Correspond with Trustee regarding asset investigation. |
| 02/23/23 | S. Gallagher | 0.3 | 164.40 | Confer with trustee regarding additional assets. |
| 02/23/23 | S. Gallagher | 0.2 | 109.60 | Research regarding information on potentially relevant trust. |
| 02/23/23 | S. Gallagher | 0.1 | 54.80 | Analysis of asset investigation and provide revision requested by Trustee. |
| 02/24/23 | S. Gallagher | 0.6 | 328.80 | Review local rules and prepare subpoenas for deposition of potential witnesses. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|---|
| 02/24/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding subpoenas to witnesses. |
| 02/24/23 | E. Wojnar | 0.4 | 116.80 | Process documents produced and create index of same. |
| 02/27/23 | S. Gallagher | 0.6 | 328.80 | Outline deposition notices to fact witnesses. |
| 02/28/23 | S. Gallagher | 0.4 | 219.20 | Review incoming documents and outstanding requests from M3. |
| 02/28/23 | S. Gallagher | 0.1 | 54.80 | Confer with Trustee regarding deposition notices. |
| 02/28/23 | S. Gallagher | 0.8 | 438.40 | Draft deposition notices to relevant witnesses. |
| Total Asset Analysis and Recovery | | 24.3 | \$ 12,935.60 | |
| <u>Asset Disposition:</u> | | | | |
| 02/09/23 | D. Trevino | 0.2 | 38.40 | Review the recently filed motion to approve sale, and calculate and docket objection deadline for same. |
| Total Asset Disposition | | 0.2 | \$ 38.40 | |
| <u>Relief from Stay/Adequate Protection Proceedings:</u> | | | | |
| 02/14/23 | S. Gallagher | 0.4 | 219.20 | Attend hearing on motion to approve assumption of lease and motion for release of automatic stay. |
| Total Relief from Stay/Adequate Protection Proceedings | | 0.4 | \$ 219.20 | |
| <u>Meetings of and Communications with Creditors:</u> | | | | |
| 02/14/23 | D. Trevino | 0.1 | 19.20 | Review the notice of continuance of meeting of creditors, docket same. |
| Total Meetings of and Communications with Creditors | | 0.1 | \$ 19.20 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 02/15/23 | K. Gradney | 0.4 | 80.00 | Prepare Jackson Walker December fee statement. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 02/24/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed UCC's application to employ Teneo as financial advisor, and calculate and docket related objection deadline. |
| Total Fee/Employment Applications | | 0.5 | \$ 99.20 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

)

Chapter 11

)

FREE SPEECH SYSTEMS LLC

)

Case No. 22-60043 (CML)

)

Debtor.

)

)

**NOTICE OF JACKSON WALKER LLP'S SEVENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM MACH 1, 2023 THROUGH MARCH 31, 2023**

| | | |
|---|-------------------------------------|----------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | March 1, 2023 | March 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$70,158.08 (80% of \$87,697.60) | |
| Total expenses requested in this Statement: | \$89.47 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$70,247.55 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$87,787.07 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$74,530.40 | |
| Total actual attorney hours covered by this Statement: | 139 | |
| Average hourly rate for attorneys: | \$536.19 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$13,167.20 | |
| Total actual paraprofessional hours covered by this Statement: | 45.9 | |
| Average hourly rate for paraprofessionals: | \$286.87 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Seventh Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period March 1, 2023 Through March 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$70,158.08 (80% of \$87,697.60) as compensation for professional services rendered to the Trustee during the period from March 1, 2023 through March 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$89.47, for a total amount of \$70,247.55.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: April 14, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|---------------------------|----------------|
| Lexis Research | \$87.47 |
| SOS Direct On Line Filing | \$2.00 |
| TOTAL | \$89.47 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---|-----------------------|-----------------|---------------------------|
| 110 | Case Administration | \$3,992.40 | | |
| 115 | Reporting | \$238.00 | | |
| 120 | Asset Analysis and Recovery | \$82,882.40 | | |
| 140 | Relief from Stay and Adequate Protection | \$38.40 | | |
| 160 | Fee/Employment Applications | \$320.00 | | |
| 185 | Assumption and Rejection of Leases and Contracts | \$226.00 | | |
| | Totals | \$87,697.60 | \$89.47 | <u>\$87,787.07</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$87,697.60 |
| 20% Fee Holdback for Fee Period | \$17,539.52 |
| 80% of Fees Amount for Fee Period | \$70,158.08 |
| Expenses for Fee Period | \$89.47 |
| TOTAL REQUEST | <u>\$70,247.55</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|------------------------------------|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 03/10/23 | E. Flynn Meraia | 1.0 | 452.00 | Research re subchapter v eligibility. |
| 03/12/23 | E. Flynn Meraia | 2.3 | 1,039.60 | Research re subchapter v eligibility (2.1); correspond with L. Freeman re same (.2). |
| 03/13/23 | E. Flynn Meraia | 1.1 | 497.20 | Research re subchapter v eligibility (1.0); correspond with L. Freeman re same (.1). |
| 03/13/23 | D. Trevino | 0.1 | 19.20 | Review and prepare for filing the notice of rule 2004 subpoena addressed to Alex Jones. |
| 03/14/23 | K. Gradney | 0.1 | 20.00 | Review and prepare for filing limited response to motion to revoke. |
| 03/15/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with Trustee regarding meeting with chief restructuring officer. |
| 03/15/23 | S. Gallagher | 0.9 | 493.20 | Telephone conference with chief restructuring officer. |
| 03/20/23 | E. Flynn Meraia | 0.5 | 226.00 | Review, revise declaration. |
| 03/23/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed notice of subpoena filed by the trustee, docket deadlines. |
| 03/23/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed motion to approve 9019, docket deadlines. |
| 03/24/23 | E. Flynn Meraia | 0.4 | 180.80 | Review, revise disclosure to the court. |
| 03/27/23 | E. Flynn Meraia | 1.5 | 678.00 | Telephonically attend hearing (partial). |
| 03/27/23 | D. Trevino | 0.1 | 19.20 | Attention to cash collateral hearing reset, docket deadlines. |
| 03/29/23 | S. Gallagher | 0.5 | 274.00 | Video conference with M3, trustee, and L. Freeman regarding status report. |
| Total Case Administration | | 8.8 | \$ 3,992.40 | |
| <u>Reporting:</u> | | | | |
| 03/01/23 | D. Trevino | 0.1 | 19.20 | Docket hearing date and related deadlines on the motion of the UCC regarding amended schedules and statements. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|--|
| 03/15/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze communications and information provided regarding Alex Jones schedules. |
| Total Reporting | | 0.5 | \$ 238.40 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 03/01/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents received from third parties and resolve production issues with the same. |
| 03/01/23 | S. Gallagher | 0.6 | 328.80 | Analyze local rules and bankruptcy code regarding rules governing sworn testimony and depositions. |
| 03/01/23 | S. Gallagher | 0.6 | 328.80 | Outline draft subpoenas for depositions to multiple witnesses. |
| 03/01/23 | E. Wojnar | 1.1 | 321.20 | Review PQPR production and index same for attorney's review. |
| 03/02/23 | E. Flynn Meraia | 1.0 | 452.00 | Draft subpoenas and notices. |
| 03/02/23 | S. Gallagher | 1.8 | 986.40 | Legal research and fact review regarding depositions of witnesses with knowledge. |
| 03/02/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee regarding discovery strategy. |
| 03/02/23 | S. Gallagher | 0.3 | 164.40 | Further conference with L. Freeman regarding deposition strategy. |
| 03/02/23 | S. Gallagher | 0.6 | 328.80 | Conference with L. Freeman and Trustee regarding preliminary draft of report and additional discovery to be conducted. |
| 03/02/23 | S. Gallagher | 0.4 | 219.20 | Draft correspondence to counsel for potential witnesses regarding depositions. |
| 03/03/23 | E. Flynn Meraia | 1.1 | 497.20 | Draft Rule 45 subpoena and 2004 exams. |
| 03/03/23 | S. Gallagher | 1.0 | 548.00 | Telephone conference with trustee, debtors' counsel, and chief restructuring officer regarding asset investigation. |
| 03/03/23 | S. Gallagher | 0.4 | 219.20 | Confer with trustee regarding asset investigation. |
| 03/03/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding asset investigation and new developments. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 03/03/23 | S. Gallagher | 0.2 | 109.60 | Confer with W. Cicack. |
| 03/03/23 | S. Gallagher | 0.8 | 438.40 | Confer with L. Freeman and Trustee regarding asset investigation and recent developments. |
| 03/03/23 | S. Gallagher | 1.1 | 602.80 | Review and analyze documents received in preparation for upcoming additional discovery. |
| 03/03/23 | S. Gallagher | 0.3 | 164.40 | Attention to draft subpoenas for documents and notice forms. |
| 03/03/23 | S. Gallagher | 0.2 | 109.60 | Receipt and review of communications from counsel for potential witnesses regarding depositions. |
| 03/04/23 | E. Flynn Meraia | 1.6 | 723.20 | Draft 2004 exams and notices. |
| 03/04/23 | S. Gallagher | 0.3 | 164.40 | Receipt and review of communications from trustee regarding asset investigation. |
| 03/04/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding additional asset investigation. |
| 03/04/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communications from E. Flynn regarding subpoenas. |
| 03/06/23 | E. Flynn Meraia | 1.1 | 497.20 | Review schedules (.5); draft 2004 request (.6). |
| 03/06/23 | S. Gallagher | 0.1 | 54.80 | Correspond with L. Freeman regarding high-priority discover items for informal witness interviews. |
| 03/06/23 | S. Gallagher | 0.1 | 54.80 | Correspond with litigation team regarding depositions. |
| 03/06/23 | S. Gallagher | 0.2 | 109.60 | Correspond with L. Freeman regarding witness interviews. |
| 03/06/23 | S. Gallagher | 0.2 | 109.60 | Correspond with V. Driver regarding examination of Alex Jones. |
| 03/06/23 | S. Gallagher | 0.1 | 54.80 | Correspond with L. Freeman regarding examination of Alex Jones. |
| 03/06/23 | S. Gallagher | 0.2 | 109.60 | Further correspondence with L. Freeman regarding examination of Alex Jones. |
| 03/06/23 | S. Gallagher | 0.1 | 54.80 | Review email and draft response to email to V. Driver regarding examination of Alex Jones. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/06/23 | S. Gallagher | 0.3 | 164.40 | Confer with V. Driver regarding exam of Alex Jones. |
| 03/06/23 | S. Gallagher | 0.4 | 219.20 | Research potential background information of person with knowledge and assess whether they have relevant information. |
| 03/06/23 | S. Gallagher | 1.5 | 822.00 | Telephone conference with person with knowledge. |
| 03/06/23 | S. Gallagher | 0.2 | 109.60 | Review email with documents from PQPR. |
| 03/06/23 | S. Gallagher | 0.7 | 383.60 | Correspond with Trustee and L. Freeman regarding witness interviews, deposition schedules, and asset investigation. |
| 03/06/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communications from W. Cicack. |
| 03/06/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with L. Freeman and counsel for Alex Jones. |
| 03/07/23 | S. Gallagher | 0.5 | 274.00 | Confer with counsel for PQPR regarding document production and information discovery. |
| 03/07/23 | S. Gallagher | 0.5 | 274.00 | Confer with Trustee and forensic expert regarding document collection and analysis. |
| 03/07/23 | S. Gallagher | 0.4 | 219.20 | Confer with L. Freeman and Trustee regarding witness interviews and additional discovery to be completed before report. |
| 03/07/23 | S. Gallagher | 0.1 | 54.80 | Telephone call and voicemails to W. Cicack and S. Lemmon. |
| 03/07/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with W. Cicack. |
| 03/07/23 | S. Gallagher | 0.1 | 54.80 | Review correspondence from W. Cicack and draft email to client regarding same. |
| 03/07/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with S. Lemmon and R. Mates. |
| 03/07/23 | S. Gallagher | 0.1 | 54.80 | Correspondence with Trustee regarding witness interviews. |
| 03/07/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with Trustee and L. Freeman regarding upcoming interviews. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/07/23 | E. Wojnar | 2.4 | 700.80 | Review PQPR production and compare with index. |
| 03/08/23 | S. Gallagher | 0.4 | 219.20 | Review and respond to emails regarding 2004 requests to Alex Jones, including review of outstanding discovery. |
| 03/08/23 | S. Gallagher | 0.1 | 54.80 | Correspond with L. Freeman regarding bank statements received. |
| 03/08/23 | S. Gallagher | 0.1 | 54.80 | Correspond with Liz Freeman regarding documents received to date. |
| 03/08/23 | E. Wojnar | 3.2 | 934.40 | Review PQPR production and compare with index. |
| 03/09/23 | E. Flynn Meraia | 1.0 | 452.00 | Draft, revise document production requests. |
| 03/09/23 | S. Gallagher | 7.8 | 4,274.40 | Attend onsite meeting with CRO, Trustee, and L. Freeman. |
| 03/09/23 | E. Wojnar | 3.0 | 876.00 | Review PQPR production and compare with index. |
| 03/10/23 | S. Gallagher | 0.3 | 164.40 | Attention to documents received from counsel for Alex Jones and communication to M3 regarding same. |
| 03/10/23 | S. Gallagher | 0.8 | 438.40 | Teleconference with Trustee and investigation team regarding investigation report. |
| 03/10/23 | S. Gallagher | 0.1 | 54.80 | Correspond with L. Butler. |
| 03/10/23 | S. Gallagher | 0.1 | 54.80 | Follow up call with L. Butler. |
| 03/10/23 | S. Gallagher | 0.2 | 109.60 | Analyze documents received and next steps in preparing the report investigation. |
| 03/10/23 | S. Gallagher | 0.6 | 328.80 | Prepare for meeting with PQPR's counsel and persons with knowledge regarding relationship between PQPR and FSS. |
| 03/10/23 | E. Wojnar | 0.8 | 233.60 | Status conference with client on next steps. |
| 03/10/23 | E. Wojnar | 1.7 | 496.40 | Review PQPR production and compare with index. |
| 03/10/23 | E. Wojnar | 0.1 | 29.20 | Review Emergency Motion exhibits and index same. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 03/12/23 | S. Gallagher | 0.1 | 54.80 | Confer with L. Freeman and E. Meraia regarding asset investigation. |
| 03/12/23 | S. Gallagher | 0.8 | 438.40 | Prepare for interview of persons with knowledge related to PQPR's relationship with FSS. |
| 03/13/23 | E. Flynn Meraia | 0.9 | 406.80 | Telephone conference with S. Gallagher, L. Freeman re document requests (.2); draft, revise 2004 document requests (.7). |
| 03/13/23 | S. Gallagher | 3.4 | 1,863.20 | Meet with counsel for PQPR and persons with knowledge regarding asset investigation. |
| 03/13/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding document requests to persons with knowledge. |
| 03/13/23 | S. Gallagher | 0.1 | 54.80 | Draft status report to client regarding access to information provided by PQPR. |
| 03/13/23 | S. Gallagher | 0.4 | 219.20 | Review documents produced by Alex Jones. |
| 03/13/23 | S. Gallagher | 1.2 | 657.60 | Review and analyze documents and notes in preparation for meeting with D. Jones and PQPR's counsel. |
| 03/13/23 | S. Gallagher | 0.2 | 109.60 | Conference with counsel for A. Gucciardi regarding witness interview. |
| 03/13/23 | S. Gallagher | 0.2 | 109.60 | Coordinate scheduling upcoming witness interviews with C. Cicack. |
| 03/13/23 | S. Gallagher | 0.3 | 164.40 | Review and analyze documents from Blackfriar regarding cryptocurrency transfers. |
| 03/13/23 | S. Gallagher | 0.3 | 164.40 | Confer with counsel for PQPR and with client representatives regarding password access to documents and financial records. |
| 03/13/23 | S. Gallagher | 0.4 | 219.20 | Meet with L. Freeman and Trustee regarding witness interview. |
| 03/13/23 | E. Wojnar | 2.9 | 846.80 | Review PQPR production and compare with index. |
| 03/14/23 | E. Flynn Meraia | 0.4 | 180.80 | Revise 2004 document requests. |
| 03/14/23 | S. Gallagher | 0.7 | 383.60 | Telephone conference with Trustee and L. Freeman regarding PQPR's involvement with FSS. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/14/23 | S. Gallagher | 2.7 | 1,479.60 | Attend meeting with PQPR's counsel and client regarding PQPR's relationship with FSS. |
| 03/14/23 | S. Gallagher | 0.9 | 493.20 | Prepare for meeting with PQPR's counsel and client regarding relationship with PQPR and FSS. |
| 03/14/23 | S. Gallagher | 0.3 | 164.40 | Further conference with Trustee and L. Freeman regarding asset analysis. |
| 03/14/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents related to entities and trusts associated with PQPR and FSS. |
| 03/14/23 | S. Gallagher | 0.4 | 219.20 | Review documents and prepare for meeting with PQPR's accountant. |
| 03/14/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with PQPR's counsel regarding information access. |
| 03/14/23 | S. Gallagher | 0.1 | 54.80 | Draft correspondence to Trustee regarding information access and permissions. |
| 03/14/23 | E. Wojnar | 0.2 | 58.40 | Reconcile documents received to ensure all documents received and categorized properly. |
| 03/14/23 | E. Wojnar | 2.9 | 846.80 | Review PQPR production and compare with index. |
| 03/15/23 | E. Flynn Meraia | 1.0 | 452.00 | Correspond with L. Freeman re document production (.2); draft 2004 document requests (.8) |
| 03/15/23 | S. Gallagher | 3.0 | 1,644.00 | Meet with PQPR's counsel and bookkeeper. |
| 03/15/23 | S. Gallagher | 0.8 | 438.40 | Prepare for meeting with bookkeeper. |
| 03/15/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with Trustee and L. Freeman. |
| 03/15/23 | S. Gallagher | 0.1 | 54.80 | Receipt and reply to email communications regarding analysis of relevant documents. |
| 03/15/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee and L. Freeman regarding document analysis, critically relevant documents, and upcoming witness interviews. |
| 03/15/23 | S. Gallagher | 0.4 | 219.20 | Review and analyze documents produced by PQPR related to operation of FSS and PQPR and the relationship between the same. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/15/23 | S. Gallagher | 0.6 | 328.80 | Revise 2004 examination requests to persons with knowledge. |
| 03/15/23 | E. Wojnar | 5.7 | 1,664.40 | Review PQPR production and compare with index to ensure all documents accounted for and create summary of same for further analysis |
| 03/16/23 | E. Flynn Meraia | 1.0 | 452.00 | Draft 2004 document requests. |
| 03/16/23 | S. Gallagher | 0.3 | 164.40 | Review and analyze deposition testimony and documents flagged by Trustee related to asset investigation. |
| 03/16/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with Trustee regarding 2004 document requests and witness interviews. |
| 03/16/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with L. Freeman regarding witness interviews and document requests. |
| 03/16/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with Trustee, CRO, counsel for FSS and L. Freeman regarding asset investigation. |
| 03/16/23 | S. Gallagher | 0.9 | 493.20 | Revise 2004 requests to potential witness. |
| 03/16/23 | S. Gallagher | 0.6 | 328.80 | Revise 2004 requests to A. Gucciardi. |
| 03/16/23 | S. Gallagher | 0.4 | 219.20 | Revise 2004 request to fact witness. |
| 03/16/23 | S. Gallagher | 0.4 | 219.20 | Revise 2004 requests to fact witness. |
| 03/16/23 | S. Gallagher | 0.8 | 438.40 | Coordinate finalizing and serving 2004 requests upon witnesses with relevant knowledge. |
| 03/16/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding service of 2004 requests and scope of discovery. |
| 03/16/23 | E. Wojnar | 0.2 | 58.40 | Review additional production and add to file for attorneys' review. |
| 03/17/23 | E. Flynn Meraia | 0.7 | 316.40 | Draft, revise document requests. |
| 03/17/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with L. Freeman regarding witness interviews and de-designation hearing. |
| 03/17/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with J. Dalessio. |
| 03/17/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Butler regarding witness interview. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/17/23 | S. Gallagher | 0.2 | 109.60 | Review and respond to email from W. Cicack regarding document production and collection. |
| 03/17/23 | S. Gallagher | 0.3 | 164.40 | Confer with Trustee and L. Freeman regarding witness interviews, document collection, and conversations with persons with knowledge. |
| 03/17/23 | S. Gallagher | 0.1 | 54.80 | Draft email to J. Dalessio regarding interview and document requests. |
| 03/17/23 | S. Gallagher | 0.1 | 54.80 | Review and reply to email from Trustee regarding asset investigation of FSS. |
| 03/17/23 | E. Wojnar | 0.1 | 29.20 | Review documents from counsel and process for attorney's further review. |
| 03/17/23 | K. Gradney | 0.1 | 20.00 | Prepare for filing Rule 2004 subpoena. |
| 03/18/23 | S. Gallagher | 0.2 | 109.60 | Review and respond to emails from client regarding witness interviews. |
| 03/20/23 | S. Gallagher | 3.2 | 1,753.60 | Meet with Trustee and E. Farrow regarding draft declarations of Bob Roe. |
| 03/20/23 | S. Gallagher | 1.1 | 602.80 | Meet with Trustee and E. Farrow regarding witness declarations. |
| 03/20/23 | S. Gallagher | 1.1 | 602.80 | Meet with Chief Restructuring Officer and counsel for FSS regarding asset investigation and witness interviews. |
| 03/20/23 | S. Gallagher | 1.4 | 767.20 | Factual investigation regarding appearances of past sponsors and existence of prior relationships with sponsors on The Alex Jones show. |
| 03/20/23 | S. Gallagher | 0.3 | 164.40 | Telephone call with Trustee regarding fact investigation and upcoming witness interviews. |
| 03/20/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with prior accountant for FSS and PQPR. |
| 03/20/23 | S. Gallagher | 0.1 | 54.80 | Draft email to financial forensic team regarding vendor reports. |
| 03/20/23 | S. Gallagher | 0.8 | 438.40 | Draft declaration of M. Flores in support of trustee's report. |
| 03/20/23 | S. Gallagher | 0.3 | 164.40 | Prepare for witness interview of A. Gucciardi. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 03/21/23 | S. Gallagher | 3.5 | 1,918.00 | Interview fact witness regarding business relationships with FSS. |
| 03/21/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with potential fact witness regarding interview. |
| 03/21/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with W. Cicack. |
| 03/21/23 | S. Gallagher | 1.0 | 548.00 | Prepare for interview of former FSS consultant. |
| 03/21/23 | E. Wojnar | 0.1 | 29.20 | Review document and add to system for attorney's further review. |
| 03/21/23 | E. Wojnar | 0.1 | 29.20 | Review additional PQPR production and categorize for attorney's review. |
| 03/22/23 | S. Gallagher | 1.7 | 931.60 | Prepare for interview with fact witness. |
| 03/22/23 | S. Gallagher | 4.8 | 2,630.40 | Meet with former FSS employee and consultant. |
| 03/22/23 | S. Gallagher | 1.0 | 548.00 | Meet with Trustee and E. Farrow regarding witness interviews and schedules. |
| 03/22/23 | S. Gallagher | 1.3 | 712.40 | Telephone conference with CRO and Trustee regarding upcoming witness interviews. |
| 03/22/23 | E. Wojnar | 0.4 | 116.80 | Process additional production from PQPR in readable format and organize for further review. |
| 03/22/23 | E. Wojnar | 2.1 | 613.20 | Review PQPR additional production to identify documents for attorney further review. |
| 03/22/23 | E. Wojnar | 0.4 | 116.80 | Prepare documents for attorney witness interview. |
| 03/23/23 | S. Gallagher | 1.3 | 712.40 | Interview of FSS affiliate marketer and consultant. |
| 03/23/23 | S. Gallagher | 2.0 | 1,096.00 | Draft and revise declarations for PQPR consultants and former FSS employees. |
| 03/23/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with FSS' CRO regarding marketing and advertising issues and additional witness interviews. |
| 03/23/23 | S. Gallagher | 0.5 | 274.00 | Follow-up meeting with Trustee and E. Farrow regarding witness interviews. |
| 03/23/23 | S. Gallagher | 2.8 | 1,534.40 | Review documents received in preparation of witness interview of FSS consultant. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/23/23 | S. Gallagher | 0.2 | 109.60 | Confer with counsel for prior witnesses interviewed regarding document production and collection. |
| 03/23/23 | S. Gallagher | 0.2 | 109.60 | Confer with former FSS employee and consultant regarding document collection and production. |
| 03/23/23 | S. Gallagher | 0.7 | 383.60 | Draft declaration for PQPR owner and managing member. |
| 03/23/23 | E. Wojnar | 0.3 | 87.60 | Research public record databases for information on Wyoming registered company. |
| 03/23/23 | E. Wojnar | 2.2 | 642.40 | Review of additional PQPR documents (1.5); draft summary of same (.7). |
| 03/24/23 | S. Gallagher | 1.2 | 657.60 | Prepare for witness interview of former FSS consultant and affiliate marketer. |
| 03/24/23 | S. Gallagher | 1.4 | 767.20 | Interview FSS consultant regarding business dealings with FSS and Alex Jones. |
| 03/24/23 | S. Gallagher | 0.5 | 274.00 | Correspond with Trustee and E. Farrow regarding status report. |
| 03/24/23 | S. Gallagher | 0.4 | 219.20 | Correspond with Trustee, Trustee's Counsel, and E. Farrow regarding Trustee's status report. |
| 03/24/23 | S. Gallagher | 0.4 | 219.20 | Meet with FSS' CRO, L. Freeman, FSS Consultant, and Trustee regarding Debtor's disclosures. |
| 03/24/23 | S. Gallagher | 0.5 | 274.00 | Confer with former FSS consultant and employee regarding document collection and production. |
| 03/24/23 | S. Gallagher | 0.2 | 109.60 | Confer with JW bankruptcy and litigation team regarding Trustee's status report. |
| 03/24/23 | S. Gallagher | 0.4 | 219.20 | Further correspondence with JW bankruptcy and litigation team regarding Trustee's Status Report. |
| 03/24/23 | E. Wojnar | 1.1 | 321.20 | Summarize additional PQPR production for attorney review. |
| 03/24/23 | E. Wojnar | 2.0 | 584.00 | Index documents received from Alex Jones for attorney review. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 03/24/23 | E. Wojnar | 0.5 | 146.00 | Summarize index based on documents received from Alex Jones for attorney review. |
| 03/26/23 | S. Gallagher | 0.5 | 274.00 | Review and analyze documents related to FSS affiliated entities and financial books and records. |
| 03/26/23 | S. Gallagher | 0.1 | 54.80 | Receipt and review of communications from Trustee regarding employee businesses. |
| 03/26/23 | S. Gallagher | 1.5 | 822.00 | Telephone conference with Trustee, L. Freeman, and E. Farrow regarding status report and de-designation hearing. |
| 03/27/23 | S. Gallagher | 2.1 | 1,150.80 | Monitor hearing on bankruptcy designation and use of cash collateral. |
| 03/27/23 | S. Gallagher | 0.4 | 219.20 | Draft proposed subpoena limitations to Walter Cicack regarding proposed limitations on subpoena and objections and circulate to trustee for approval. |
| 03/27/23 | S. Gallagher | 3.7 | 2,027.60 | Review and analyze documents collected from investigation and information obtained from witness interviews. |
| 03/27/23 | S. Gallagher | 0.1 | 54.80 | Draft email to M3 consultants regarding distributions to Alex Jones. |
| 03/27/23 | S. Gallagher | 0.5 | 274.00 | Phone conference with Sub 5 trustee, L. Freeman, E. Farrow, and M3 regarding the hearing and next steps. |
| 03/27/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with Trustee, L. Freeman, and E. Farrow regarding Mountain Way. |
| 03/27/23 | E. Wojnar | 0.4 | 116.80 | Index documents received from PQPR and summarize findings for attorneys' review. |
| 03/27/23 | E. Wojnar | 1.6 | 467.20 | Index documents received to date in preparation of report deadline |
| 03/28/23 | S. Gallagher | 0.3 | 164.40 | Revise declaration of former FSS employee. |
| 03/28/23 | S. Gallagher | 0.4 | 219.20 | Revise declaration of former PQPR consultant. |
| 03/28/23 | S. Gallagher | 0.3 | 164.40 | Revise declaration of PQPR member. |
| 03/28/23 | S. Gallagher | 0.2 | 109.60 | Review and analyze email, including attachment, from Trustee and draft response. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 03/28/23 | S. Gallagher | 0.2 | 109.60 | Analyze bank records of FSS and FSS schedules of assets. |
| 03/28/23 | S. Gallagher | 0.1 | 54.80 | Draft email to counsel for PQPR regarding declarations. |
| 03/28/23 | S. Gallagher | 0.1 | 54.80 | Draft email to counsel for consultant for FSS and Alex Jones regarding document collection. |
| 03/28/23 | S. Gallagher | 0.3 | 164.40 | Initial draft of status report regarding credit card processing. |
| 03/28/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with Trustee, L. Freeman, E. Farrow regarding document collection and financial investigation. |
| 03/28/23 | E. Wojnar | 4.2 | 1,226.40 | Index documents received from FSS in preparation of report deadline. |
| 03/29/23 | S. Gallagher | 0.3 | 164.40 | Review and analyze M3 analysis and report. |
| 03/29/23 | S. Gallagher | 3.1 | 1,698.80 | Review and analyze documents and prepare indices of document collection in support of status report. |
| 03/29/23 | S. Gallagher | 2.3 | 1,260.40 | Draft and revise Trustee's report to the Court. |
| 03/29/23 | S. Gallagher | 0.8 | 438.40 | Telephone conference with Trustee, L. Freeman, and E. Farrow regarding Mountain Way disclosures. |
| 03/29/23 | E. Wojnar | 3.7 | 1,080.40 | Index documents reviewed in preparation of report deadline |
| 03/30/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with counsel for PQPR. |
| 03/30/23 | S. Gallagher | 1.5 | 822.00 | Review and analyze reports from financial consultant and source documents. |
| 03/30/23 | S. Gallagher | 1.9 | 1,041.20 | Review and analyze documents collected and information from witness interviews in support of allegations in Trustee's report to the Court. |
| 03/30/23 | S. Gallagher | 3.7 | 2,027.60 | Draft and outline sections of Trustee report related to document collection efforts and credit card processor relationship. |
| 03/31/23 | S. Gallagher | 2.2 | 1,205.60 | Draft and revise Trustee status report. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 03/31/23 | S. Gallagher | 3.1 | 1,698.80 | Review and analyze information in support of trustee status report, including documents obtained, witness interview notes, and financial consultant reports. |
| 03/31/23 | S. Gallagher | 1.2 | 657.60 | Telephone conference with Trustee, L. Freeman, and E. Farrow regarding trustee report. |
| Total Asset Analysis and Recovery | | 173.3 | \$ 82,882.40 | |

Relief from Stay/Adequate Protection Proceedings:

| | | | | |
|--|------------|-----|----------|--|
| 03/20/23 | D. Trevino | 0.2 | 38.40 | Attention to the recently filed MFR of De La Rosa, docket deadlines. |
| Total Relief from Stay/Adequate Protection Proceedings | | 0.2 | \$ 38.40 | |

Fee/Employment Applications:

| | | | | |
|-----------------------------------|------------|-----|-----------|---|
| 03/19/23 | K. Gradney | 0.5 | 100.00 | Update December fee statement (.1); prepare January and February fee statements (.4). |
| 03/28/23 | K. Gradney | 0.9 | 180.00 | Update Jackson Walker fee statements. |
| 03/30/23 | K. Gradney | 0.2 | 40.00 | Update January fee statement. |
| Total Fee/Employment Applications | | 1.6 | \$ 320.00 | |

Assumption/Rejection of Leases and Contracts:

| | | | | |
|--|-----------------|-----|-----------|---|
| 03/14/23 | E. Flynn Meraia | 0.5 | 226.00 | Review, revise objection to motion to assume or reject. |
| Total Assumption/Rejection of Leases and Contracts | | 0.5 | \$ 226.00 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

)
)
)
)
)
)
)

Chapter 11

Case No. 22-60043 (CML)

**NOTICE OF JACKSON WALKER LLP'S EIGHTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM APRIL 1, 2023 THROUGH APRIL 30, 2023**

| | | |
|---|-------------------------------------|----------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant's Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | April 1, 2023 | April 30, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$29,013.44 (80% of \$36,266.80) | |
| Total expenses requested in this Statement: | \$0.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$29,013.44 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$36,266.80 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$34,236.00 | |
| Total actual attorney hours covered by this Statement: | 63 | |
| Average hourly rate for attorneys: | \$543.43 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$2,030.80 | |
| Total actual paraprofessional hours covered by this Statement: | 8.1 | |
| Average hourly rate for paraprofessionals: | \$250.72 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Eighth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period April 1, 2023 Through April 30, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$29,013.44 (80% of \$36,266.80) as compensation for professional services rendered to the Trustee during the period from April 1, 2023 through April 30, 2023 (the “Fee Period”). JW did not incur any expenses during the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: July 26, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| TOTAL | \$0.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-----------------|---------------------------|
| 110 | Case Administration | \$804.00 | | |
| 120 | Asset Analysis and Recovery | \$34,648.80 | | |
| 150 | Meetings and Communications with Creditors | \$54.80 | | |
| 160 | Fee/Employment Applications | \$759.20 | | |
| | Totals | \$36,266.80 | \$0.00 | <u>\$36,266.80</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$36,266.80 |
| 20% Fee Holdback for Fee Period | \$7,253.36 |
| 80% of Fees Amount for Fee Period | \$29,013.44 |
| Expenses for Fee Period | \$0.00 |
| TOTAL REQUEST | <u>\$29,013.44</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 04/11/23 | D. Trevino | 0.1 | 19.20 | Review docket regarding the hearing on motion to approve 9019, calendar same. |
| 04/12/23 | S. Gallagher | 0.1 | 54.80 | Confer with L. Freeman regarding potential mediation and outstanding issues. |
| 04/13/23 | E. Wojnar | 0.2 | 58.40 | Review documents and index same for attorneys' easy review. |
| 04/17/23 | E. Wojnar | 0.4 | 116.80 | Review additional documents, save to file and index same. |
| 04/20/23 | E. Wojnar | 0.1 | 29.20 | Review additional production received and save for attorney's further review. |
| 04/20/23 | E. Wojnar | 1.1 | 321.20 | Review documents produced to locate attorney's information who produced documents and PQPR production document for additional review. |
| 04/20/23 | E. Wojnar | 0.7 | 204.40 | Analyze new production and documents received to organize effectively for attorneys' review. |
| Total Case Administration | | 2.7 | \$ 804.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 04/01/23 | S. Gallagher | 6.6 | 3,616.80 | Draft and revise Trustee's report to the court. |
| 04/01/23 | S. Gallagher | 2.5 | 1,370.00 | Video conference and joint revision and drafting of trustee report with trustee, L. Freeman, and E. Farrow. |
| 04/02/23 | S. Gallagher | 7.8 | 4,274.40 | Draft and finalize trustee report to the Court, including exhibits. |
| 04/02/23 | S. Gallagher | 1.5 | 822.00 | Video conference with Trustee's team regarding revisions, analysis, and drafting of Trustee's report. |
| 04/02/23 | S. Gallagher | 0.6 | 328.80 | Additional video conference with Trustee's team regarding revisions, analysis, and drafting of Trustee's report. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 04/02/23 | S. Gallagher | 1.7 | 931.60 | Additional video conference with Trustee's team regarding revisions, analysis, and drafting of Trustee's report. |
| 04/02/23 | S. Gallagher | 1.0 | 548.00 | Additional video conference with Trustee's team regarding revisions, analysis, and drafting of Trustee's report. |
| 04/02/23 | S. Gallagher | 2.0 | 1,096.00 | Additional video conference with Trustee's team regarding revisions, analysis, and drafting of Trustee's report. |
| 04/02/23 | E. Wojnar | 1.6 | 467.20 | Compile exhibits in preparation of report deadline. |
| 04/03/23 | E. Flynn Meraia | 3.0 | 1,356.00 | Review, revise Trustee's report. |
| 04/03/23 | S. Gallagher | 9.7 | 5,315.60 | Draft and finalize Trustee status report to the Court. |
| 04/03/23 | S. Gallagher | 3.4 | 1,863.20 | Video conference with Trustee, L. Freeman, and E. Farrow regarding revisions and drafting of trustee report. |
| 04/03/23 | S. Gallagher | 1.5 | 822.00 | Additional video conference with Trustee, L. Freeman, and E. Farrow regarding revisions and drafting of trustee report. |
| 04/03/23 | S. Gallagher | 0.1 | 54.80 | Additional video conference with Trustee, L. Freeman, and E. Farrow regarding revisions and drafting of trustee report. |
| 04/03/23 | E. Wojnar | 0.3 | 87.60 | Revise exhibits in preparation of trustee report deadline. |
| 04/04/23 | S. Gallagher | 2.4 | 1,315.20 | Revise and finalize both sealed and unsealed Trustee initial report to the Court. |
| 04/05/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with Trustee regarding cryptocurrency tracing. |
| 04/05/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with Trustee and L. Freeman regarding cryptocurrency tracing and supplemental report information. |
| 04/05/23 | S. Gallagher | 0.2 | 109.60 | Review available documents regarding cryptocurrency payments. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|---|
| 04/05/23 | E. Wojnar | 0.1 | 29.20 | Review documents and save in database for attorneys' further review. |
| 04/07/23 | S. Gallagher | 0.6 | 328.80 | Telephone conference with Trustee regarding bitcoin tracing and additional information on assets. |
| 04/07/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with Trustee regarding additional document collection. |
| 04/07/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with trustee and M3 regarding bitcoin tracing. |
| 04/10/23 | S. Gallagher | 0.8 | 438.40 | Telephone conference with Trustee, L. Freeman, and E. Farrow regarding next steps and conference with the court. |
| 04/10/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with W. Cicack regarding motion to quash. |
| 04/10/23 | S. Gallagher | 0.1 | 54.80 | Telephone call and voicemail to W. Cicack regarding motion to quash. |
| 04/11/23 | S. Gallagher | 0.6 | 328.80 | Telephone conference CRO and trustee regarding asset investigation. |
| 04/12/23 | S. Gallagher | 1.0 | 548.00 | Telephone conference with L. Freeman, E. Farrow, and trustee regarding additional investigation |
| 04/12/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with L. Freeman regarding mediation and next steps. |
| 04/13/23 | S. Gallagher | 0.1 | 54.80 | Telephone call and voicemail to W. Cicack. |
| 04/14/23 | S. Gallagher | 1.6 | 876.80 | Telephone conference with CRO, counsel for FSS, Trustee and L. Freeman regarding next steps, outstanding issues, asset investigation, and upcoming pleadings. |
| 04/18/23 | S. Gallagher | 0.4 | 219.20 | Confer with Trustee, E. Farrow, and L. Freeman regarding additional asset investigation. |
| 04/18/23 | S. Gallagher | 0.3 | 164.40 | Confer with W. Cicack regarding document production. |
| 04/19/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding status of document production from outstanding requests and asset investigation. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 04/20/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with Trustee regarding document collection and supplemental report. |
| 04/20/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with fact witness regarding additional asset investigation. |
| 04/20/23 | S. Gallagher | 0.4 | 219.20 | Telephone conference with Trustee, E. Farrow, and L. Freeman regarding supplemental report and additional 2004 requests. |
| 04/20/23 | S. Gallagher | 2.9 | 1,589.20 | Review and analyze documents received to assess potential additional assets and additional document requests. |
| 04/21/23 | S. Gallagher | 0.3 | 164.40 | Confer with W. Cicack regarding document production. |
| 04/21/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding document collection status and asset analysis. |
| 04/21/23 | S. Gallagher | 0.1 | 54.80 | Receive and consider communication from L. Butler. |
| 04/21/23 | S. Gallagher | 0.2 | 109.60 | Confer with Trustee and E. Farrow regarding document collection, supplemental reports, and outstanding issues. |
| 04/24/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference regarding potential mediation and plan formation. |
| 04/25/23 | S. Gallagher | 0.2 | 109.60 | Draft second 2004 request to ESG. |
| 04/25/23 | S. Gallagher | 0.1 | 54.80 | Draft email to W. Cicack regarding document production. |
| 04/25/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with L. Freeman regarding document collection and production. |
| 04/25/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with Trustee regarding document collection and 2004 request to fact witness. |
| 04/26/23 | S. Gallagher | 0.3 | 164.40 | Draft notice of 2004 and document requests to ESG. |
| 04/26/23 | S. Gallagher | 0.3 | 164.40 | Draft subpoena to ESG in support of 2004 requests. |
| 04/26/23 | S. Gallagher | 0.3 | 164.40 | Correspond with Trustee and L. Freeman regarding draft 2004 notice and subpoena. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|---|
| 04/26/23 | S. Gallagher | 0.3 | 164.40 | Correspond with Trustee and L. Freeman regarding response to W. Cicack. |
| 04/26/23 | S. Gallagher | 0.8 | 438.40 | Review and analyze current document production from fact witness and assess missing documents. |
| 04/27/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with fact witness regarding 2004 notice and subpoena. |
| 04/27/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with Trustee and E. Farrow regarding 2004 notice, potential new information, and recommendation. |
| 04/27/23 | S. Gallagher | 0.9 | 493.20 | Telephone conference with Trustee, E. Farrow,, CRO and FSS' counsel regarding upcoming hearings, FSS products, and FSS contracts. |
| 04/27/23 | S. Gallagher | 0.2 | 109.60 | Correspond with L. Freeman regarding 2004 notice and investigation. |
| 04/27/23 | S. Gallagher | 0.5 | 274.00 | Review and consider supplemental report by trustee. |
| 04/27/23 | S. Gallagher | 0.4 | 219.20 | Correspond with Trustee and L. Freeman regarding supplemental report. |
| 04/28/23 | S. Gallagher | 0.2 | 109.60 | Confer with L. Freeman regarding 2004 examination notices. |
| 04/28/23 | S. Gallagher | 0.1 | 54.80 | Draft email to W. Cicack regarding 2004 notice. |
| 04/28/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with trustee regarding upcoming status conference and 2004 exams. |
| 04/28/23 | K. Gradney | 0.5 | 100.00 | Finalize for filing the supplement to the Subchapter V Trustee's initial report regarding investigation of Free Speech Systems. |
| 04/28/23 | D. Trevino | 0.3 | 57.60 | Redact supplement to trustee's report. |
| Total Asset Analysis and Recovery | | 65.2 | \$ 34,648.80 | |

Meetings of and Communications with Creditors:

| | | | | |
|----------|--------------|-----|-------|--|
| 04/06/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference to counsel for UCC. |
|----------|--------------|-----|-------|--|

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|--|
| Total Meetings of and Communications with Creditors | | 0.1 | \$ 54.80 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 04/02/23 | K. Gradney | 0.5 | 100.00 | Update December and January fee statements for billing. |
| 04/02/23 | K. Gradney | 1.2 | 240.00 | Prepare Jackson Walker February and March fee statements. |
| 04/10/23 | S. Gallagher | 0.4 | 219.20 | Attention to preparation of fee invoices for submission. |
| 04/11/23 | K. Gradney | 0.4 | 80.00 | Update March monthly fee statement. |
| 04/14/23 | K. Gradney | 0.6 | 120.00 | Update and finalize for filing February and March monthly fee statements for Jackson Walker. |
| Total Fee/Employment Applications | | 3.1 | \$ 759.20 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Chapter 11

FREE SPEECH SYSTEMS LLC

Case No. 22-60043 (CML)

Debtor.

**NOTICE OF JACKSON WALKER LLP'S NINTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

| | | |
|--|-------------------------------------|----------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | May 1, 2023 | May 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$28,113.72 (80% of \$35,142.15) | |
| Total expenses requested in this Statement: | \$1,592.46 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$29,706.18 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$36,734.61 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$33,458.55 | |
| Total actual attorney hours covered by this Statement: | 61 | |
| Average hourly rate for attorneys: | \$548.50 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$1,683.60 | |
| Total actual paraprofessional hours covered by this Statement: | 6.2 | |
| Average hourly rate for paraprofessionals: | \$271.55 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Ninth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period May 1, 2023 Through May 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$28,113.72 (80% of \$35,142.15) as compensation for professional services rendered to the Trustee during the period from May 1, 2023 through May 31, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$1,592.46, for a total of \$29,706.18.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: July 26, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|-------------------|
| Airfare | \$609.86 |
| Business Meals | \$35.82 |
| Hotel | \$880.78 |
| Staff Overtime | \$66.00 |
| TOTAL | \$1,592.46 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-------------------|---------------------------|
| 110 | Case Administration | \$2,101.60 | | |
| 120 | Asset Analysis and Recovery | \$23,720.80 | | |
| 140 | Relief from Stay and Adequate Protection | \$19.20 | | |
| 160 | Fee/Employment Applications | \$189.60 | | |
| 185 | Assumption and Rejection of Leases and Contracts | \$54.80 | | |
| 195 | Non-Working Travel | \$8,274.80 | | |
| 220 | Employee Benefits and Pensions | \$742.95 | | |
| 230 | Financing and Cash Collateral | \$38.40 | | |
| | Totals | \$35,142.15 | \$1,592.46 | <u>\$36,734.61</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$35,142.15 |
| 20% Fee Holdback for Fee Period | \$7,028.43 |
| 80% of Fees Amount for Fee Period | \$28,113.72 |
| Expenses for Fee Period | \$1,592.46 |
| TOTAL REQUEST | <u>\$29,706.18</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 05/01/23 | S. Gallagher | 0.2 | 109.60 | Confer with potential location hosts for upcoming 2004 examination. |
| 05/08/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed notices for status conference re Agreement on Allocation of Future Website Crypto Donations, calendar same. |
| 05/09/23 | S. Gallagher | 0.3 | 164.40 | Correspond with court reporting service in preparation for deposition of C. Cicack. |
| 05/19/23 | S. Gallagher | 3.3 | 1,808.40 | Appear for status conference and confer with counsel for interested parties, debtors' counsel, and Alex Jones's counsel post-hearing regarding resolution of outstanding issues and potential plan. |
| Total Case Administration | | 3.9 | \$ 2,101.60 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 05/01/23 | S. Gallagher | 0.4 | 219.20 | Correspond with W. Cicack regarding 2004 examination. |
| 05/01/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with L. Freeman regarding upcoming status conference and outstanding issues and examinations. |
| 05/01/23 | S. Gallagher | 0.2 | 109.60 | Correspond with Trustee regarding proposed 2004 examination. |
| 05/01/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with Trustee regarding asset investigation. |
| 05/01/23 | S. Gallagher | 0.5 | 274.00 | Confer with Trustee, L. Freeman, and CRO regarding discovery investigation and operations at FSS. |
| 05/01/23 | S. Gallagher | 0.4 | 219.20 | Confer with W. Cicack regarding 2004 examination. |
| 05/01/23 | S. Gallagher | 0.4 | 219.20 | Review documents received in response to 2004 notice from fact witness. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 05/01/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with fact witness regarding supplemental document production. |
| 05/01/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with L. Freeman regarding asset investigation strategy and 2004 examinations. |
| 05/02/23 | S. Gallagher | 0.8 | 438.40 | Review documents and prepare for 2004 examination of fact witness. |
| 05/02/23 | S. Gallagher | 0.6 | 328.80 | Correspond with W. Cicack and counsel for the UCC regarding 2004 examinations. |
| 05/02/23 | S. Gallagher | 0.2 | 109.60 | Analyze supplemental production from fact witness. |
| 05/02/23 | E. Wojnar | 0.3 | 87.60 | Review additional production received and note missing documents to attorney. |
| 05/03/23 | S. Gallagher | 0.3 | 164.40 | Telephone conference with counsel for UCC. |
| 05/03/23 | S. Gallagher | 0.6 | 328.80 | Correspond with counsel for UCC and W. Cicack regarding examination. |
| 05/03/23 | S. Gallagher | 1.8 | 986.40 | Prepare for upcoming witness examination, including review of documents, outstanding issues, and outline of scope. |
| 05/03/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with Trustee regarding 2004 examinations and document collection. |
| 05/03/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with fact witness and subpoena recipient regarding document collection and production. |
| 05/03/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with L. Freeman regarding scope of 2004 examination. |
| 05/03/23 | E. Wojnar | 0.2 | 58.40 | Review additional production and index same for attorney's review. |
| 05/04/23 | S. Gallagher | 0.7 | 383.60 | Correspond with W. Cicack regarding 2004 examination. |
| 05/04/23 | S. Gallagher | 0.5 | 274.00 | Telephone conference with L. Freeman, Trustee, and E. Farrow, regarding 2004 examination and recent developments with Alex Jones' counsel. |
| 05/04/23 | E. Wojnar | 0.1 | 29.20 | Review additional documents and index same for attorney's review. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 05/05/23 | S. Gallagher | 0.1 | 54.80 | Correspond with fact witness regarding document collection and production. |
| 05/05/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with Trustee regarding document collection and production. |
| 05/05/23 | S. Gallagher | 1.9 | 1,041.20 | Prepare for and outline deposition of fact witness. |
| 05/05/23 | D. Trevino | 0.2 | 38.40 | Review various notices for 2004, calendar deadlines. |
| 05/08/23 | S. Gallagher | 1.2 | 657.60 | Draft and finalize 2004 exam notice and subpoena to C. Cicack. |
| 05/09/23 | D. Trevino | 0.3 | 57.60 | Review various deposition notices, calendar same. |
| 05/10/23 | S. Gallagher | 0.3 | 164.40 | Confer with counsel for UCC regarding upcoming deposition and court reporting service. |
| 05/10/23 | S. Gallagher | 0.1 | 54.80 | Telephone conference with trustee regarding case status and upcoming examinations. |
| 05/11/23 | S. Gallagher | 0.4 | 219.20 | Outline examination topics and issues for upcoming 2004 examination of C. Cicack. |
| 05/11/23 | S. Gallagher | 0.1 | 54.80 | Correspond with S. Jordan regarding upcoming 2004 examination. |
| 05/11/23 | S. Gallagher | 0.1 | 54.80 | Correspond with reporting service regarding upcoming 2004 examination. |
| 05/11/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with fact witness regarding document production in response to subpoena. |
| 05/11/23 | E. Wojnar | 0.3 | 87.60 | Review new production received and index same for attorney's review. |
| 05/12/23 | E. Wojnar | 0.2 | 58.40 | Review additional documents received and index same for attorney's review. |
| 05/15/23 | S. Gallagher | 0.6 | 328.80 | Telephone conference with Trustee in preparation for 2004 examination. |
| 05/15/23 | S. Gallagher | 1.4 | 767.20 | Prepare for and attend telephone conference with CRO, Trustee, and E. Farrow regarding 2004 examination. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-------------|-------------------|--------------|---------------|--|
| 05/15/23 | S. Gallagher | 0.3 | 164.40 | Confer with L. Freeman regarding 2004 examination. |
| 05/15/23 | S. Gallagher | 5.2 | 2,849.60 | Review documents and prepare for upcoming 2004 examination, including outline of issues to be examined. |
| 05/15/23 | S. Gallagher | 0.3 | 164.40 | Correspond with J. Patterson regarding document production. |
| 05/15/23 | S. Gallagher | 0.1 | 54.80 | Correspond with W. Cicack regarding redactions. |
| 05/15/23 | E. Wojnar | 1.1 | 321.20 | Redact production for C. Cicack deposition, create depo prep binder for attorney and index additional production. |
| 05/15/23 | E. Wojnar | 1.1 | 321.20 | Prepare exhibits for C. Cicack deposition. |
| 05/16/23 | S. Gallagher | 4.8 | 2,630.40 | Review and analyze documents produced by deponent. |
| 05/16/23 | S. Gallagher | 4.2 | 2,301.60 | Outline and prepare for 2004 examination of fact witness. |
| 05/16/23 | E. Wojnar | 1.3 | 379.60 | Prepare exhibits for tomorrow's deposition. |
| 05/16/23 | E. Wojnar | 0.2 | 58.40 | Review additional production and index same for attorney. |
| 05/17/23 | S. Gallagher | 7.2 | 3,945.60 | Prepare for and appear at 2004 examination of fact witness. |
| 05/18/23 | S. Gallagher | 0.7 | 383.60 | Telephone conference with Trustee, E. Farrow, and L. Freeman regarding 2004 examination and preparation for status conference. |
| 05/22/23 | S. Gallagher | 0.3 | 164.40 | Draft email analysis to Trustee, E. Farrow, and L. Freeman regarding debtor's property and intellectual property issues. |
| 05/22/23 | S. Gallagher | 0.6 | 328.80 | Review docket and upcoming noticed 2004 examinations by UCC. |
| 05/22/23 | E. Wojnar | 0.1 | 29.20 | Review rough draft transcript of C. Cicack and download same for attorneys' review. |
| 05/24/23 | S. Gallagher | 0.7 | 383.60 | Review 2004 examination notices filed by UCC regarding document production and collection. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|---|
| 05/25/23 | S. Gallagher | 0.2 | 109.60 | Correspond with Trustee regarding 2004 examinations by UCC. |
| 05/25/23 | S. Gallagher | 0.8 | 438.40 | Review and analyze 2004 examination notices filed by UCC. |
| Total Asset Analysis and Recovery | | 45.9 | \$ 23,720.80 | |

Relief from Stay/Adequate Protection Proceedings:

| | | | | |
|--|------------|-----|----------|---|
| 05/16/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed motion for relief of security bank, calendar deadlines. |
| Total Relief from Stay/Adequate Protection Proceedings | | 0.1 | \$ 19.20 | |

Fee/Employment Applications:

| | | | | |
|-----------------------------------|--------------|-----|-----------|---|
| 05/20/23 | K. Gradney | 0.3 | 60.00 | Prepare Jackson Walker April fee statement. |
| 05/21/23 | K. Gradney | 0.1 | 20.00 | Update Jackson Walker April fee statement. |
| 05/22/23 | S. Gallagher | 0.2 | 109.60 | Review and revise April fee statement. |
| Total Fee/Employment Applications | | 0.6 | \$ 189.60 | |

Assumption/Rejection of Leases and Contracts:

| | | | | |
|--|--------------|-----|----------|--|
| 05/25/23 | S. Gallagher | 0.1 | 54.80 | Review stipulation and agreed order to extend time to assume commercial real property lease between FSS and BCC UBC LLC. |
| Total Assumption/Rejection of Leases and Contracts | | 0.1 | \$ 54.80 | |

Non-Working Travel:

| | | | | |
|--------------------------|--------------|------|-------------|--|
| 05/16/23 | S. Gallagher | 4.8 | 2,630.40 | Travel to 2004 examination. |
| 05/18/23 | S. Gallagher | 4.5 | 2,466.00 | Return travel from 2004 examination. |
| 05/19/23 | S. Gallagher | 5.8 | 3,178.40 | Travel to Houston, TX and return to Austin, TX for status conference with the Court. |
| Total Non-Working Travel | | 15.1 | \$ 8,274.80 | |

Employee Benefits/Pensions:

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|--|
| 05/24/23 | J. Staple | 1.3 | 742.95 | Review and comment on executive agreement from labor and employment perspective. |
| Total Employee Benefits/Pensions | | 1.3 | \$ 742.95 | |
| <u>Financing/Cash Collections:</u> | | | | |
| 05/10/23 | D. Trevino | 0.1 | 19.20 | Review the recently filed cash collateral order, docket deadlines. |
| 05/25/23 | D. Trevino | 0.1 | 19.20 | Calendar deadlines for the cash collateral hearing. |
| Total Financing/Cash Collections | | 0.2 | \$ 38.40 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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) Chapter 11
)
) Case No. 22-60043 (CML)
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**NOTICE OF JACKSON WALKER LLP'S TENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH JUNE 30, 2023**

| | | |
|---|-------------------------------------|---------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | June 1, 2023 | June 30, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$1,667.84 (80% of \$2,084.80) | |
| Total expenses requested in this Statement: | \$4,501.10 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$6,168.94 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$6,585.90 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$1,657.60 | |
| Total actual attorney hours covered by this Statement: | 3.2 | |
| Average hourly rate for attorneys: | \$518.00 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$427.20 | |
| Total actual paraprofessional hours covered by this Statement: | 1.7 | |
| Average hourly rate for paraprofessionals: | \$251.29 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Tenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period June 1, 2023 Through June 30, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$1,667.84 (80% of \$2,084.80) as compensation for professional services rendered to the Trustee during the period from June 1, 2023 through June 30, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$4,501.10 for a total of \$6,168.94.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: July 26, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|--------------------|-------------------|
| Esquire Deposition | \$3,091.10 |
| Esquire Deposition | \$1,41.00 |
| TOTAL | \$4,501.10 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---|-----------------------|-------------------|--------------------------|
| 110 | Case Administration | \$203.20 | | |
| 120 | Asset Analysis and Recovery | \$1,271.20 | | |
| 140 | Relief from Stay and Adequate Protection | \$38.00 | | |
| 160 | Fee/Employment Applications | \$120.00 | | |
| 220 | Employee Benefits and Pensions | \$452.00 | | |
| | Totals | \$2,084.80 | \$4,501.10 | <u>\$6,168.94</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$2,084.80 |
| 20% Fee Holdback for Fee Period | \$416.96 |
| 80% of Fees Amount for Fee Period | \$1,667.84 |
| Expenses for Fee Period | \$4,501.10 |
| TOTAL REQUEST | <u>\$6,168.94</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 06/04/23 | S. Gallagher | 0.2 | 109.60 | Correspond with Trustee re bankruptcy administration. |
| 06/16/23 | M. Wilkins | 0.3 | 93.60 | Sharefile data updates. |
| Total Case Administration | | 0.5 | \$ 203.20 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 06/05/23 | S. Gallagher | 0.3 | 164.40 | Correspond with counsel for UCC regarding depositions and discovery. |
| 06/07/23 | S. Gallagher | 0.6 | 328.80 | Analyze potentially avoidable transactions and outline potential response. |
| 06/08/23 | S. Gallagher | 0.2 | 109.60 | Correspond with C Cicack re production and response to 2004 notice. |
| 06/08/23 | E. Wojnar | 0.4 | 116.80 | Review correspondence from counsel (.1); index production for attorney's review (.3). |
| 06/12/23 | S. Gallagher | 0.4 | 219.20 | Draft analysis related to potential outstanding liabilities owed to FSS for Trustee. |
| 06/16/23 | S. Gallagher | 0.3 | 164.40 | Confer with counsel for ESG and for UCC regarding access to documents. |
| 06/20/23 | S. Gallagher | 0.2 | 109.60 | Telephone conference with counsel for UCC. |
| 06/23/23 | E. Wojnar | 0.1 | 29.20 | Correspond with counsel regarding discovery production. |
| 06/26/23 | E. Wojnar | 0.1 | 29.20 | Review index to determine status of produced documents. |
| Total Asset Analysis and Recovery | | 2.6 | \$ 1,271.20 | |
| <u>Relief from Stay/Adequate Protection Proceedings:</u> | | | | |
| 06/02/23 | D. Trevino | 0.2 | 38.40 | Calculate and docket related deadlines to recently filed motion for relief from stay. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|---|
| Total Relief from Stay/Adequate Protection Proceedings | | 0.2 | \$ 38.40 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 06/15/23 | K. Gradney | 0.6 | 120.00 | Prepare Jackson Walker May fee statement. |
| Total Fee/Employment Applications | | 0.6 | \$ 120.00 | |
| <u>Employee Benefits/Pensions:</u> | | | | |
| 06/20/23 | E. Flynn Meraia | 1.0 | 452.00 | Revise employment agreement (.8); correspond re same (.2). |
| Total Employee Benefits/Pensions | | 1.0 | \$ 452.00 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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Chapter 11

Case No. 22-60043 (CML)

**NOTICE OF JACKSON WALKER LLP'S ELEVENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM JULY 1, 2023 THROUGH JULY 31, 2023**

| | | |
|---|-------------------------------------|---------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | July 1, 2023 | July 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$5,432.16 (80% of \$6,790.20) | |
| Total expenses requested in this Statement: | \$44.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$5,476.16 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$6,834.20 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$6,359.80 | |
| Total actual attorney hours covered by this Statement: | 11.1 | |
| Average hourly rate for attorneys: | \$572.95 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$430.40 | |
| Total actual paraprofessional hours covered by this Statement: | 1.6 | |
| Average hourly rate for paraprofessionals: | \$269.00 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Eleventh Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period July 1, 2023 Through July 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$5,432.16 (80% of \$6,790.20) as compensation for professional services rendered to the Trustee during the period from July 1, 2023 through July 31, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$44.00 for a total of \$5,476.16.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: October 3, 2022

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|----------------|
| Staff Overtime | \$44.00 |
| TOTAL | \$44.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|-----------------------------------|-----------------------|-----------------|--------------------------|
| 120 | Asset Analysis and Recovery | \$1,008.00 | | |
| 160 | Fee/Employment Applications | \$354.00 | | |
| 220 | Employee Benefits and Pensions | \$5,428.20 | | |
| | Totals | \$6,790.20 | \$44.00 | <u>\$6,834.20</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$6,790.20 |
| 20% Fee Holdback for Fee Period | \$1,358.04 |
| 80% of Fees Amount for Fee Period | \$5,432.16 |
| Expenses for Fee Period | \$44.00 |
| TOTAL REQUEST | <u>\$5,476.16</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Asset Analysis and Recovery:</u> | | | | |
| 07/12/23 | E. Wojnar | 1.2 | 350.40 | Review document production and index same for attorneys. |
| 07/17/23 | S. Gallagher | 0.4 | 219.20 | Review and consider adversary proceeding filed against PQPR. |
| 07/18/23 | S. Gallagher | 0.3 | 164.40 | Review upcoming deposition schedule and witness order. |
| 07/25/23 | S. Gallagher | 0.3 | 164.40 | Review deposition scheduling and upcoming depositions. |
| 07/26/23 | S. Gallagher | 0.2 | 109.60 | Draft email summary to M. Haselden regarding upcoming depositions. |
| Total Asset Analysis and Recovery | | 2.4 | \$ 1,008.00 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 07/23/23 | K. Gradney | 0.4 | 80.00 | Prepare Jackson Walker June fee statement. |
| 07/25/23 | S. Gallagher | 0.3 | 164.40 | Review and revise fee statements for June and May. |
| 07/26/23 | S. Gallagher | 0.2 | 109.60 | Review and revise fee statement application. |
| Total Fee/Employment Applications | | 0.9 | \$ 354.00 | |
| <u>Employee Benefits/Pensions:</u> | | | | |
| 07/03/23 | J. Staple | 1.8 | 1,028.70 | Review and respond to comments and proposed amended language to A. Jones agreement (.8); draft proposed exhibit A release agreement to A. Jones agreement (1.). |
| 07/06/23 | J. Staple | 1.2 | 685.80 | Prepare for call re A. Jones agreement (.2); attend call re A. Jones agreement and proposed edits (.8); finalize and circulate sample release and severance agreement (.2). |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|----------------------------------|-------------------|--------------|---------------|---|
| 07/07/23 | J. Staple | 0.5 | 285.75 | Review V. Driver amendments to agreement (.2); email correspondence with employee benefits group regarding 409A (.2); amend release to include COBRA payments (.1). |
| 07/07/23 | A. Garrison | 1.1 | 646.80 | Review draft of employment agreement for 409A compliance and related email correspondence with J. Staple. |
| 07/08/23 | A. Garrison | 1.1 | 646.80 | Complete review of employment agreement for 409A compliance and related email correspondence with J. Staple. |
| 07/10/23 | J. Staple | 1.1 | 628.65 | Review and incorporate employee benefits comments into agreement. |
| 07/10/23 | A. Garrison | 1.2 | 705.60 | Review and update draft of employment agreement for 409A comments. |
| 07/11/23 | J. Staple | 0.4 | 228.60 | Finalize review of employee benefits comments and points of concern into draft A. Jones agreement and circulate same to team. |
| 07/12/23 | J. Staple | 0.3 | 171.45 | Attend telephone conference regarding revisions to Jones agreement. |
| 07/17/23 | J. Staple | 0.4 | 228.60 | Review edits to employment agreement and respond to V. Driver email regarding same. |
| 07/27/23 | J. Staple | 0.3 | 171.45 | Review and respond to V. Driver email with amended agreement, including reviewing proposed edits and providing agreement draft with edited formatting. |
| Total Employee Benefits/Pensions | | 9.4 | \$ 5,428.20 | |
| Total Fees | | | | \$6,790.20 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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Chapter 11

Case No. 22-60043 (CML)

**NOTICE OF JACKSON WALKER LLP'S TWELFTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM AUGUST 1, 2023 THROUGH AUGUST 31, 2023**

| | | |
|---|-------------------------------------|-----------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | August 1, 2023 | August 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$6,826.88 (80% of \$8,533.60) | |
| Total expenses requested in this Statement: | \$1,862.95 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$8,689.83 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$10,396.55 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$8,416.80 | |
| Total actual attorney hours covered by this Statement: | 15.2 | |
| Average hourly rate for attorneys: | \$553.74 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$116.80 | |
| Total actual paraprofessional hours covered by this Statement: | 0.4 | |
| Average hourly rate for paraprofessionals: | \$292.00 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Twelfth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period August 1, 2023 Through August 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$6,826.88 (80% of \$8,533.60) as compensation for professional services rendered to the Trustee during the period from August 1, 2023 through August 31, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$1,862.95 for a total of \$8,689.83.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor' Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) iii. a Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: October 3, 2023

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|--------------------|-------------------|
| Staff Overtime | \$22.00 |
| Copying Expense | \$28.20 |
| Esquire Deposition | \$1,812.75 |
| TOTAL | \$1,862.95 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|-----------------------------|-----------------------|-------------------|---------------------------|
| 120 | Asset Analysis and Recovery | \$8,533.60 | | |
| | Totals | \$8,533.60 | \$1,862.95 | <u>\$10,396.55</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$8,533.60 |
| 20% Fee Holdback for Fee Period | \$1,706.72 |
| 80% of Fees Amount for Fee Period | \$8,689.83 |
| Expenses for Fee Period | \$1,862.95 |
| TOTAL REQUEST | <u>\$8,689.83</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Asset Analysis and Recovery:</u> | | | | |
| 08/08/23 | S. Gallagher | 0.1 | 54.80 | Confer with counsel for UCC regarding upcoming depositions. |
| 08/14/23 | S. Gallagher | 0.4 | 219.20 | Confer with R. Battaglia and W. Cicack regarding production of records received from C. Cicack to Debtor's counsel. |
| 08/15/23 | S. Gallagher | 0.3 | 164.40 | Confer with UCC counsel regarding upcoming deposition schedule. |
| 08/16/23 | S. Gallagher | 0.1 | 54.80 | Produce requested documents to Debtor's counsel. |
| 08/17/23 | S. Gallagher | 0.8 | 438.40 | Correspond with M. Haselden, L. Freeman, and V. Argeroplos regarding upcoming depositions. |
| 08/17/23 | S. Gallagher | 0.4 | 219.20 | Correspond with UCC counsel regarding upcoming depositions. |
| 08/17/23 | S. Gallagher | 0.8 | 438.40 | Review and analyze relevant documents in preparation for upcoming depositions. |
| 08/18/23 | V. Argeroplos | 0.7 | 389.20 | Review correspondence, docket, and background information to prepare for meeting and depositions next week (.3); meet with S. Gallagher regarding background and facts needed at P. Riley deposition (.4). |
| 08/18/23 | S. Gallagher | 1.4 | 767.20 | Deposition preparation for upcoming depositions of E. Jones and P. Reilly. |
| 08/22/23 | V. Argeroplos | 0.2 | 111.20 | Correspondence with D. Hill and S. Gallagher regarding E. Wulf deposition. |
| 08/23/23 | V. Argeroplos | 10.0 | 5,560.00 | Review trustee report and other information in preparation for P. Riley deposition (2.0); attend deposition of P. Riley (7.6); follow up discussion with counsel following deposition (.3); correspondence with M. Haselden regarding notes from deposition (.1). |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 08/29/23 | E. Wojnar | 0.1 | 29.20 | Review draft 2004 notice to D. Jones and request confirmation to serve in preparation of August 31 deposition. |
| 08/30/23 | E. Wojnar | 0.3 | 87.60 | Draft cross-notice for D. Jones for deposition on August 31, 2023. |
| Total Asset Analysis and Recovery | | 15.6 | \$ 8,533.60 | |
| Total Fees | | | | \$8,533.60 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

)
) Chapter 11
)
) Case No. 22-60043 (CML)
)
)
)

**NOTICE OF JACKSON WALKER LLP'S THIRTEENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

| | | |
|---|-------------------------------------|--------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | September 1, 2023 | September 30, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$13,733.44 (80% of \$17,166.80) | |
| Total expenses requested in this Statement: | \$1,856.75 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$15,590.19 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$19,023.55 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$16,676.40 | |
| Total actual attorney hours covered by this Statement: | 31.3 | |
| Average hourly rate for attorneys: | \$532.79 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$490.40 | |
| Total actual paraprofessional hours covered by this Statement: | 1.9 | |
| Average hourly rate for paraprofessionals: | \$258.11 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Thirteenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period September 1, 2023 Through September 30, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$13,733.44 (80% of \$17,166.80) as compensation for professional services rendered to the Trustee during the period from September 1, 2023 through September 30, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$1,856.75 for a total of \$15,590.19.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 23, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|--------------------|-------------------|
| Staff Overtime | \$44.00 |
| Esquire Deposition | \$1,812.75 |
| TOTAL | \$1,856.75 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---------------------------------|-----------------------|-------------------|--------------------|
| 120 | Asset Analysis and Recovery | \$17,026.80 | | |
| 160 | Employment and Fee Applications | \$140.00 | | |
| | Totals | \$17,166.80 | \$1,856.75 | \$19,023.55 |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$17,166.80 |
| 20% Fee Holdback for Fee Period | \$3,433.36 |
| 80% of Fees Amount for Fee Period | \$13,733.44 |
| Expenses for Fee Period | \$1,856.75 |
| TOTAL REQUEST | <u>\$15,590.19</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Asset Analysis and Recovery:</u> | | | | |
| 09/06/23 | A. Derrig | 8.5 | 4,182.00 | Attend deposition of Erika Wulff Jones. |
| 09/11/23 | S. Gallagher | 0.8 | 438.40 | Prepare for upcoming depositions of David Jones and Alex Jones. |
| 09/11/23 | S. Gallagher | 2.1 | 1,150.80 | Review witness examination notes and prior document productions in preparation for Alex Jones' deposition. |
| 09/11/23 | E. Wojnar | 0.4 | 116.80 | Review correspondence regarding additional production documents and prepare for upload for further analysis. |
| 09/12/23 | S. Gallagher | 4.5 | 2,466.00 | Attend deposition of Alex Jones. |
| 09/12/23 | S. Gallagher | 1.0 | 548.00 | Confer with L. Freeman, Sub V Trustee, and E. Farrow regarding deposition of Alex Jones. |
| 09/12/23 | S. Gallagher | 1.9 | 1,041.20 | Prepare for continuing deposition of Alex Jones. |
| 09/12/23 | S. Gallagher | 1.0 | 548.00 | Confer with L. Freeman, Sub V Trustee, and E. Farrow regarding deposition of Alex Jones. |
| 09/13/23 | S. Gallagher | 4.5 | 2,466.00 | Attend and depose Alex Jones. |
| 09/13/23 | S. Gallagher | 0.8 | 438.40 | Meet and confer with Trustee, L. Freeman, E. Farrow, and counsel for Alex Jones regarding the deposition of Alex Jones and FSS assets. |
| 09/15/23 | S. Gallagher | 0.5 | 274.00 | Plan and prepare for deposition of David Jones and additional witness interviews. |
| 09/19/23 | S. Gallagher | 5.7 | 3,123.60 | Appear for deposition of Joey Dalessio. |
| 09/20/23 | E. Wojnar | 0.6 | 175.20 | Review email from Akin counsel re production documents (.1); review document production portal to identify same for attorney's review (.5). |
| 09/22/23 | E. Wojnar | 0.2 | 58.40 | Review documents received to isolate deposition transcripts for attorney's further review. |
| Total Asset Analysis and Recovery | | 32.5 | \$ 17,026.80 | |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|---|
| <u>Fee/Employment Applications:</u> | | | | |
| 09/20/23 | K. Gradney | 0.7 | 140.00 | Prepare July and August fee statements. |
| Total Fee/Employment Applications | | 0.7 | \$ 140.00 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

)

Chapter 11

)

FREE SPEECH SYSTEMS LLC

)

Case No. 22-60043 (CML)

)

Debtor.

)

)

**NOTICE OF JACKSON WALKER LLP'S FOURTEENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

| | | |
|--|-------------------------------------|----------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | October 1, 2023 | October 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$12,005.76 (80% of \$15,007.20) | |
| Total expenses requested in this Statement: | \$22.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$12,027.76 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$15,029.20 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$14,642.00 | |
| Total actual attorney hours covered by this Statement: | 25.2 | |
| Average hourly rate for attorneys: | \$581.03 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$365.20 | |
| Total actual paraprofessional hours covered by this Statement: | 1.3 | |
| Average hourly rate for paraprofessionals: | \$280.92 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Fourteenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period October 1, 2023 Through October 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$12,005.76 (80% of \$15,007.20) as compensation for professional services rendered to the Trustee during the period from October 1, 2023 through October 31, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$22.00 for a total of \$12,027.76.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 23, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|----------------|
| Staff Overtime | \$22.00 |
| TOTAL | \$22.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---|-----------------------|-----------------|---------------------------|
| 120 | Asset Analysis and Recovery | \$14,563.60 | | |
| 160 | Employment and Fee Applications | \$88.00 | | |
| 310 | Claims Administration and Objections | \$355.60 | | |
| | Totals | \$15,007.20 | \$22.00 | <u>\$15,029.20</u> |

| | |
|--|---------------------------|
| Total Fees for Fee Period | \$15,007.20 |
| 20% Fee Holdback for Fee Period | \$3,001.44 |
| 80% of Fees Amount for Fee Period | \$12,005.76 |
| Expenses for Fee Period | \$22.00 |
| TOTAL REQUEST | <u>\$12,027.76</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Asset Analysis and Recovery:</u> | | | | |
| 10/02/23 | S. Gallagher | 5.1 | 3,060.00 | Appear for deposition of David Jones. |
| 10/03/23 | S. Gallagher | 5.9 | 3,540.00 | Attend Dr. Jones deposition. |
| 10/03/23 | S. Gallagher | 0.9 | 540.00 | Meet with Trustee's team, US Trustee, and Plaintiff's counsel. |
| 10/03/23 | C. Kidd | 0.6 | 247.20 | Review and analyze vendor contract related to potential dispute regarding terms and conditions. |
| 10/04/23 | S. Gallagher | 5.2 | 3,120.00 | Meeting with Trustee's team, Debtor's counsel, Mr. Jones, and Mr. Jones' counsel. |
| 10/10/23 | S. Gallagher | 0.4 | 240.00 | Analyze potential challenge to vendor interpretation of terms and conditions. |
| 10/10/23 | C. Kidd | 0.7 | 288.40 | Review and analyze vendor contract related to potential dispute regarding terms and conditions. |
| 10/11/23 | C. Kidd | 0.9 | 370.80 | Draft email to S Gallagher summarizing analysis of potential challenge to vendor's interpretation of terms and conditions. |
| 10/13/23 | S. Gallagher | 0.3 | 180.00 | Review and analyze communication from W. Cicack and confer with Trustee and L. Freeman regarding contents of communication. |
| 10/18/23 | S. Gallagher | 0.2 | 120.00 | Review proposal from counsel regarding negotiations (.1); confer with Trustee regarding potential resolutions (.1). |
| 10/19/23 | S. Gallagher | 0.5 | 300.00 | Telephone conference with W. Cicack, V. Driver, and R. Battaglia. |
| 10/19/23 | S. Gallagher | 0.4 | 240.00 | Confer with Trustee regarding conversations with counsel for A. Jones, FSS, and third party and upcoming deposition. |
| 10/19/23 | S. Gallagher | 0.4 | 240.00 | Review and analyze outstanding document requests from M3. |
| 10/19/23 | S. Gallagher | 0.8 | 480.00 | Review and analyze orders on summary judgment entered by the Court. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|---|
| 10/20/23 | S. Gallagher | 0.8 | 480.00 | Review and analyze documents received from third parties in response to additional requests from M3. |
| 10/20/23 | S. Gallagher | 1.2 | 720.00 | Review and analyze summary judgment orders from the court, including underlying supportive authority. |
| 10/23/23 | S. Gallagher | 0.2 | 120.00 | Confer with E. Wojnar regarding collection of bank statements and additional information requested by M3. |
| 10/23/23 | E. Wojnar | 0.6 | 184.80 | Review documents received to date to ensure all production has been produced. |
| 10/24/23 | E. Wojnar | 0.3 | 92.40 | Summarize documents requested to clarify with attorney. |
| Total Asset Analysis and Recovery | | 25.4 | \$ 14,563.60 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 10/03/23 | K. Gradney | 0.4 | 88.00 | Finalize for service Jackson Walker July and August fee statements. |
| Total Fee/Employment Applications | | 0.4 | \$ 88.00 | |
| <u>Claims Administration and Objections:</u> | | | | |
| 10/03/23 | E. Flynn Meraia | 0.7 | 355.60 | Draft joinder objection (.5); correspond re same (.2). |
| Total Claims Administration and Objections | | 0.7 | \$ 355.60 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Chapter 11

FREE SPEECH SYSTEMS LLC

Case No. 22-60043 (CML)

Debtor.

**NOTICE OF JACKSON WALKER LLP'S
COMBINED FIFTEENTH MONTHLY FEE STATEMENT FOR
COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE
FOR THE PERIOD FROM NOVEMBER 1, 2023 THROUGH DECEMBER 31, 2023**

| | | |
|---|-------------------------------------|-------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | November 1, 2023 | December 31, 2023 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$4,530.64 (80% of \$5,663.30) | |
| Total expenses requested in this Statement: | \$143.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$4,673.64 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$5,806.30 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$4,919.70 | |
| Total actual attorney hours covered by this Statement: | 8.2 | |
| Average hourly rate for attorneys: | \$599.96 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$743.60 | |
| Total actual paraprofessional hours covered by this Statement: | 2.5 | |
| Average hourly rate for paraprofessionals: | \$297.44 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Combined Fifteenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period November 1, 2023 Through December 31, 2023* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$4,530.64 (80% of \$5,663.30) as compensation for professional services rendered to the Trustee during the period from November 1, 2023 through December 31, 2023 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$143.00 for a total of \$4,673.64.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the

Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattaglia@outlook.com);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: January 23, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|-----------------|
| Staff Overtime | \$143.00 |
| TOTAL | \$143.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|--|-----------------------|-----------------|-------------------|
| 110 | Case Administration | \$186.00 | | |
| 120 | Asset Analysis and Recovery | \$5,057.60 | | |
| 150 | Meetings and Communications with Creditors | \$120.00 | | |
| 160 | Employment and Fee Applications | \$180.00 | | |
| 220 | Employee Benefits and Pensions | \$119.70 | | |
| | Totals | \$5,663.30 | \$143.00 | \$5,806.30 |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$5,663.30 |
| 20% Fee Holdback for Fee Period | \$1,132.66 |
| 80% of Fees Amount for Fee Period | \$4,530.64 |
| Expenses for Fee Period | \$143.00 |
| TOTAL REQUEST | <u>\$4,673.64</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 11/15/23 | S. Gallagher | 0.2 | 120.00 | Telephone conference with J. Wertz regarding recent case developments and potential recommendations to Trustee. |
| 12/12/23 | K. Gradney | 0.3 | 66.00 | Prepare notice of appearance for J Wertz (.1); correspond with J Wertz and S. Gallagher re same (.1); finalize same for filing (.1). |
| Total Case Administration | | 0.5 | \$ 186.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 11/13/23 | E. Wojnar | 0.1 | 30.80 | Review letter from court reporter re no errata sheet submitted for J. Dalessio and request status of transcript from attorney. |
| 11/20/23 | S. Gallagher | 0.1 | 60.00 | Confer with counsel for UCC regarding upcoming deposition and attendance on behalf of Sub V Trustee. |
| 11/28/23 | S. Gallagher | 7.2 | 4,320.00 | Appear for deposition of Robert Schleizer. |
| 11/29/23 | E. Wojnar | 1.2 | 369.60 | Review depositions taken to date by Esquire Reporting and compile same for attorney review. |
| 11/30/23 | E. Wojnar | 0.9 | 277.20 | Review deposition documents for Alex Jones, David Jones and Charlie Cicack and ensure all documents received and correspondence with records provider regarding missing exhibit for David Jones. |
| Total Asset Analysis and Recovery | | 9.5 | \$ 5,057.60 | |
| <u>Meetings of and Communications with Creditors:</u> | | | | |
| 12/11/23 | S. Gallagher | 0.2 | 120.00 | Confer with Trustee regarding expenses and resolution of questions from the UCC. |
| Total Meetings of and Communications with Creditors | | 0.2 | \$ 120.00 | |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|-------------------|--------------|---------------|---|
| <u>Fee/Employment Applications:</u> | | | | |
| 11/01/23 | S. Gallagher | 0.3 | 180.00 | Review of fee statements for Jackson Walker. |
| Total Fee/Employment Applications | | 0.3 | \$ 180.00 | |
| <u>Employee Benefits/Pensions:</u> | | | | |
| 12/21/23 | J. Staple | 0.2 | 119.70 | Review and respond to V. Driver email regarding no termination by employee without cause. |
| Total Employee Benefits/Pensions | | 0.2 | \$ 119.70 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS LLC

Debtor.

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Chapter 11

Case No. 22-60043 (CML)

**NOTICE OF JACKSON WALKER LLP'S SIXTEENTH
MONTHLY FEE STATEMENT FOR COMPENSATION
OF SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

| | | |
|---|-------------------------------------|------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | January 1, 2024 | January 31, 2024 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$3,186.12 (80% of \$3,982.65) | |
| Total expenses requested in this Statement: | \$44.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$3,230.12 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$4,026.65 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$3,243.45 | |
| Total actual attorney hours covered by this Statement: | 4.9 | |
| Average hourly rate for attorneys: | \$661.93 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$739.20 | |
| Total actual paraprofessional hours covered by this Statement: | 3.2 | |
| Average hourly rate for paraprofessionals: | \$231.00 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Sixteenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period January 1, 2024 Through January 31, 2024* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$3,186.12 (80% of \$3,982.65) as compensation for professional services rendered to the Trustee during the period from January 1, 2024 through January 31, 2024 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$44.00 for a total of \$3,230.12.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia, rbattagliaw@outlook.com);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: May 2, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|----------------|
| Staff Overtime | \$44.00 |
| TOTAL | \$44.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---------------------------------|-----------------------|-----------------|--------------------------|
| 110 | Case Administration | \$1,898.45 | | |
| 120 | Asset Analysis and Recovery | \$360.00 | | |
| 160 | Employment and Fee Applications | \$1,568.50 | | |
| 320 | Plan and Disclosure Statement | \$155.70 | | |
| | Totals | \$3,982.65 | \$44.00 | <u>\$4,026.65</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$3,982.65 |
| 20% Fee Holdback for Fee Period | \$796.53 |
| 80% of Fees Amount for Fee Period | \$3,186.12 |
| Expenses for Fee Period | \$44.00 |
| TOTAL REQUEST | <u>\$3,230.12</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|---|
| <u>Case Administration:</u> | | | | |
| 01/16/24 | J. Wertz | 0.5 | 389.25 | Attendance at status conference set by Judge Lopez. |
| 01/16/24 | S. Gallagher | 0.3 | 180.00 | Confer with counsel for UCC regarding requests for documents. |
| 01/16/24 | S. Gallagher | 0.6 | 360.00 | Review documents received in response to request from UCC's counsel. |
| 01/16/24 | K. Gradney | 0.3 | 66.00 | Coordinate hearing appearances for status conference (.1); attend status conference (.2). |
| 01/19/24 | E. Wojnar | 0.4 | 123.20 | Review documents received to date and confirm production for attorney. |
| 01/30/24 | S. Gallagher | 0.8 | 480.00 | Confer with L. Freeman and Trustee regarding resolution and outstanding information requests and issues. |
| 01/30/24 | S. Gallagher | 0.5 | 300.00 | Confer with counsel for the UCC and outline communication to FSS counsel in response to recent inquiries. |
| Total Case Administration | | 3.4 | \$ 1,898.45 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 01/30/24 | S. Gallagher | 0.6 | 360.00 | Review documents received from FSS in response to requests from FSS counsel and counsel for the UCC. |
| Total Asset Analysis and Recovery | | 0.6 | \$ 360.00 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 01/08/24 | K. Gradney | 1.1 | 242.00 | Prepare JW monthly fee statements. |
| 01/09/24 | J. Wertz | 0.4 | 311.40 | Review and revise October monthly fee statement for Jackson Walker. |
| 01/09/24 | J. Wertz | 0.3 | 233.55 | Review and revise November/December combined monthly fee statement for Jackson Walker. |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 01/09/24 | J. Wertz | 0.3 | 233.55 | Review and revise September monthly fee statement for Jackson Walker. |
| 01/10/24 | K. Gradney | 0.7 | 154.00 | Prepare Jackson Walker first interim fee application. |
| 01/17/24 | S. Gallagher | 0.4 | 240.00 | Review and revise fee statements. |
| 01/17/24 | K. Gradney | 0.1 | 22.00 | Correspond with S Gallagher and J Wertz re monthly fee statements. |
| 01/23/24 | K. Gradney | 0.6 | 132.00 | Update September, October and combined November/December fee statements for service. |
| Total Fee/Employment Applications | | 3.9 | \$ 1,568.50 | |

Plan and Disclosure Statement (including Business Plan):

| | | | | |
|---|----------|-----|-----------|--|
| 01/24/24 | J. Wertz | 0.2 | 155.70 | Telephonic attendance at hearing on conditional approval of disclosure statements. |
| Total Plan and Disclosure Statement (including Business Plan) | | 0.2 | \$ 155.70 | |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Chapter 11

FREE SPEECH SYSTEMS LLC

Case No. 22-60043 (CML)

Debtor.

**NOTICE OF JACKSON WALKER LLP'S
COMBINED SEVENTEENTH MONTHLY FEE STATEMENT FOR
COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM FEBRUARY 1, 2024 THROUGH MARCH 31, 2024**

| | | |
|---|-------------------------------------|----------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | February 1, 2024 | March 31, 2024 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$4,116.16 (80% of \$5,145.20) | |
| Total expenses requested in this Statement: | \$5,863.85 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$9,980.01 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$11,009.05 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$4,850.40 | |
| Total actual attorney hours covered by this Statement: | 7.9 | |
| Average hourly rate for attorneys: | \$613.97 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$294.80 | |
| Total actual paraprofessional hours covered by this Statement: | 1.1 | |
| Average hourly rate for paraprofessionals: | \$268.00 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Combined Seventeenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period February 1, 2024 Through March 31, 2024* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$4,116.16 (80% of \$5,145.20) as compensation for professional services rendered to the Trustee during the period from February 1, 2024 through March 31, 2024 (the “Fee Period”); and necessary and reasonable expenses in the amount of \$5,863.85 for a total of \$9,980.01.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia,);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: May 2, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|------------------------|-------------------|
| Staff Overtime | \$308.00 |
| Deposition Transcripts | \$5,555.85 |
| TOTAL | \$5,863.85 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---------------------------------|-----------------------|-------------------|---------------------------|
| 110 | Case Administration | \$3,664.80 | | |
| 160 | Employment and Fee Applications | \$1,300.40 | | |
| 320 | Plan and Disclosure Statement | \$180.00 | | |
| | Totals | \$5,145.20 | \$5,863.85 | <u>\$11,009.05</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$5,145.20 |
| 20% Fee Holdback for Fee Period | \$1,029.04 |
| 80% of Fees Amount for Fee Period | \$4,116.16 |
| Expenses for Fee Period | \$5,863.85 |
| TOTAL REQUEST | <u>\$9,980.01</u> |

EXHIBIT C

DETAILED RECORD OF FEES FOR THE FEE PERIOD

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Chapter 11

FREE SPEECH SYSTEMS LLC

Case No. 22-60043 (CML)

Debtor.

**NOTICE OF JACKSON WALKER LLP'S
COMBINED EIGHTEENTH MONTHLY FEE STATEMENT FOR
COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS COUNSEL TO THE SUBCHAPTER V TRUSTEE FOR
THE PERIOD FROM APRIL 1, 2024 THROUGH MAY 31, 2024**

| | | |
|--|-------------------------------------|----------------------|
| Name of Applicant: | Jackson Walker LLP | |
| Applicant’s Role in Case: | Counsel to the Subchapter V Trustee | |
| Date Order of Employment Signed: | November 7, 2022 | |
| | Beginning of Period: | End of Period |
| Time period covered by this Statement: | April 1, 2024 | May 31, 2024 |
| Summary of Total Fees and Expenses Requested | | |
| Total fees requested in this Statement: | \$4,034.56 (80% of \$5,043.20) | |
| Total expenses requested in this Statement: | \$0.00 | |
| Total fees and expenses requested in this Statement (exclusive of 20% Holdback): | \$4,034.56 | |
| Total fees and expenses referenced in this Statement (inclusive of 20% Holdback): | \$5,043.20 | |
| Summary of Attorney Fees Requested | | |
| Total attorney fees requested in this Statement: | \$4,198.80 | |
| Total actual attorney hours covered by this Statement: | 6.4 | |
| Average hourly rate for attorneys: | \$4,198.80 | |
| Summary of Paraprofessional Fees Requested | | |
| Total paraprofessional fees requested in this Statement: | \$844.40 | |
| Total actual paraprofessional hours covered by this Statement: | 4.1 | |
| Average hourly rate for paraprofessionals: | \$205.95 | |

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 202], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time), 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the “Fee Procedures Order”) [Docket No. 202], Jackson Walker LLP (“JW”), as counsel to the Subchapter V Trustee, hereby files its *Combined Eighteenth Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Counsel to the Subchapter V Trustee for the Period April 1, 2024 Through May 31, 2024* (“Monthly Fee Statement”).

1. Pursuant to the Fee Procedures Order, JW seeks interim payment of \$4,034.56 (80% of \$5,043.20) as compensation for professional services rendered to the Trustee during the period from April 1, 2024 through May 31, 2024 (the “Fee Period”). JW did not have any expenses for the Fee Period.

2. In support of the Monthly Fee Statement, JW submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel for the Fee Period*, attached hereto as **Exhibit B**, and a *Detailed Record of Fees as Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Fee Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses shall, within fourteen (14) days of service of the Monthly Fee Statement, serve via email to JW, and the following Application Recipients (as defined in the Fee Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue (the “Notice of Objection”) on or before 4:00 p.m. (prevailing Central Time) fourteen (14) days after service of this Monthly Fee Statement:

- (a) The Debtor, the Chief Restructuring Officer of FSS, at the address indicated in this Court's docket;
- (b) The Debtor's Counsel, Law Offices of Ray Battaglia, PLLC, 766 Granburg Circle, San Antonio, Texas 78218 (Attn: Ray Battaglia,);
- (c) Minh Nguyen, Office of the United States Trustee, 515 Rusk St. Ste 3516, Houston, TX 77002 (ha.nguyen@usdoj.gov);
- (d) Melissa Anne Haselden, Haselden Farrow PLLC, Pennzoil Place, 700 Milam, Suite 1300, Houston, TX 77002 (mhaselden@haseldenfarrow.com); and
- (e) Any other parties that the Court may designate.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. JW reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Fee Procedures Order.

Dated: June 6, 2024

/s/ Sean F. Gallagher

JACKSON WALKER LLP

Jennifer F. Wertz (TX Bar No. 24072822)

Sean F. Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: jwertz@jw.com

Email: sgallagher@jw.com

Email: emeraia@jw.com

Co-Counsel to the Subchapter V Trustee

EXHIBIT A

SUMMARY OF EXPENSES FOR THE FEE PERIOD

| EXPENSE | TOTAL |
|----------------|---------------|
| TOTAL | \$0.00 |

EXHIBIT B**SUMMARY OF LEGAL FEES AND EXPENSES
BY CATEGORY FOR THE FEE PERIOD**

| | DESCRIPTION | LEGAL FEES | EXPENSES | TOTAL |
|-----|---------------------------------|-----------------------|-----------------|--------------------------|
| 110 | Case Administration | \$960.00 | | |
| 120 | Asset Analysis and Recovery | \$366.80 | | |
| 130 | Asset Disposition | \$73.60 | | |
| 160 | Employment and Fee Applications | \$3,212.00 | | |
| 210 | Business Operations | \$92.00 | | |
| 320 | Plan and Disclosure Statement | \$368.80 | | |
| | Totals | \$5,043.20 | \$0.00 | <u>\$5,043.20</u> |

| | |
|--|--------------------------|
| Total Fees for Fee Period | \$5,043.20 |
| 20% Fee Holdback for Fee Period | \$1,008.64 |
| 80% of Fees Amount for Fee Period | \$4,034.56 |
| Expenses for Fee Period | \$0.00 |
| TOTAL REQUEST | <u>\$4,034.56</u> |

EXHIBIT C**DETAILED RECORD OF FEES FOR THE FEE PERIOD**

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|--|--------------------------|---------------------|----------------------|--|
| <u>Case Administration:</u> | | | | |
| 04/04/24 | S. Gallagher | 0.8 | 480.00 | Confer with L. Freeman and Trustee regarding legal obligations and relevant legal considerations related to bankruptcy. |
| 04/04/24 | S. Gallagher | 0.8 | 480.00 | Confer with JW colleagues regarding trustee obligations and relevant legal considerations related to bankruptcy. |
| Total Case Administration | | 1.6 | \$ 960.00 | |
| <u>Asset Analysis and Recovery:</u> | | | | |
| 04/15/24 | S. Gallagher | 0.5 | 300.00 | Confer with L. Freeman regarding document collection and investigation. |
| 05/01/24 | S. Teso | 0.2 | 36.80 | Calculate and docket deadlines for Axos Bank and Security Bank of Crawford to produce documents. |
| Total Asset Analysis and Recovery | | 0.7 | \$ 336.80 | |
| <u>Asset Disposition:</u> | | | | |
| 05/01/24 | S. Teso | 0.2 | 36.80 | Calculate and docket deadline to respond to motion to sell filed in A. Jones matter. |
| 05/14/24 | S. Teso | 0.2 | 36.80 | Review court docket (.1); calendar hearing on Motion to Sell and deadlines related thereto (.1). |
| Total Asset Disposition | | 0.4 | \$ 73.60 | |
| <u>Fee/Employment Applications:</u> | | | | |
| 04/03/24 | K. Gradney | 0.4 | 88.00 | Prepare combined seventeenth fee statement. |
| 04/04/24 | J. Wertz | 0.2 | 138.40 | Correspond with S. Gallagher concerning fee statements. |
| 05/01/24 | K. Gradney | 0.2 | 44.00 | Confer with S Gallagher re monthly fee statements and interim fee application (.1); revise and finalize February/March fee statement (.1). |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|-----------------------------------|-------------------|--------------|---------------|--|
| 05/02/24 | K. Gradney | 0.8 | 176.00 | Finalize January and Combined monthly fee statements for service (.1); revise interim fee application (.6); confer with S Gallagher re same and notice parties (.1). |
| 05/03/24 | K. Gradney | 0.2 | 44.00 | Update interim fee application. |
| 05/08/24 | J. Wertz | 0.6 | 415.20 | Revisions to background section of interim fee application for Jackson Walker. |
| 05/08/24 | K. Gradney | 0.1 | 22.00 | Confer re interim fee application. |
| 05/21/24 | J. Wertz | 0.9 | 622.80 | Revisions to draft interim fee application for JW. |
| 05/21/24 | K. Gradney | 0.8 | 176.00 | Revise interim fee application (.6); confer with J Wertz and S Gallagher re same (.1); correspond with M Haselden re same (.1). |
| 05/30/24 | S. Gallagher | 0.4 | 240.00 | Confer with counsel for FSS and administrative team regarding fee statements and final fee application. |
| 05/31/24 | J. Wertz | 1.8 | 1,245.60 | Revise draft first interim fee application to include additional information re services performed during fee period. |
| Total Fee/Employment Applications | | 6.4 | \$ 3,212.00 | |

Business Operations:

| | | | | |
|---------------------------|---------|-----|----------|---|
| 05/01/24 | S. Teso | 0.2 | 36.80 | Calculate and docket deadlines re response to motion for turnover of property. |
| 05/02/24 | S. Teso | 0.3 | 55.20 | Docket and calculate any related deadlines re status conference and hearing on Motion for Turnover of Property. |
| Total Business Operations | | 0.5 | \$ 92.00 | |

Plan and Disclosure Statement (including Business Plan):

| | | | | |
|----------|----------|-----|--------|---|
| 05/07/24 | S. Teso | 0.2 | 36.80 | Calculate and docket hearing dates and related deadlines re confirmation hearing. |
| 05/21/24 | J. Wertz | 0.4 | 276.80 | Review case scheduling notes re setting of confirmation hearing (.2); correspond with S. Gallagher re same (.2) |

| <u>Date</u> | <u>Timekeeper</u> | <u>Hours</u> | <u>Amount</u> | <u>Description</u> |
|---|-------------------|--------------|---------------|--|
| 05/23/24 | S. Teso | 0.3 | 55.20 | Review court docket (.2); calendar hearing on confirmation and related deadlines (.1). |
| Total Plan and Disclosure Statement (including Business Plan) | | 0.9 | \$ 368.80 | |